



DEC 22 2015

Gabriel Hernández - Atkins Caribe, LLP
Metro Office Park
Lote 8 Calle 1, Suite 102
Guaynabo, Puerto Rico 00968

Estimado señor Hernández:

Autoridad de los Puertos de Puerto Rico
Terminal Ferry Culebra
Reconstrucción y Reparación de Rampa
Playa Sardinias, Culebra
O-BD-CZM01-SJ-00530-17112014
Solicitud Conjunta Núm. 1397

El Departamento de Recursos Naturales y Ambientales (DRNA) recibió el proyecto descrito en epígrafe. La Autoridad de Puertos de Puerto Rico propone la Reconstrucción de la Rampa del Terminal del Ferry, y la construcción de un Terminal de Emergencia en San Ildefonso en la Bahía Ensenada Honda, ambos en el Municipio de Culebra.

Este Departamento entiende que las obras de mitigación propuestas son aceptables para el proyecto propuesto. A tales efectos, el DRNA endosa dicho proyecto, siempre y cuando la Autoridad de Puertos de Puerto Rico cumpla con lo siguiente:

1. La mitigación por el impacto a las hierbas marinas dentro de la huella de impacto del proyecto será la instalación de cuatro (4) boyas de amarre en Las Pelas. Previo a su instalación, se deberá coordinar con el DRNA la localización exacta de las mismas. Se hace constar que el mantenimiento de las boyas durante la fase de construcción es responsabilidad de la Autoridad de Puertos de Puerto Rico. Una vez finalice la construcción del proyecto, el mantenimiento de las boyas durante la fase de operación del terminal será responsabilidad de la Autoridad de Transporte Marítimo.
2. Para la mitigación por el impacto a los corales dentro del área del proyecto, se deberán trasplantar los mismos fuera de dicha área. El lugar de trasplante se determinará próximamente, previo al comienzo del proyecto.



DEC 22 2015

3. La mitigación por el impacto de los químicos, ruidos y sedimentación productos del proyecto será la restauración del área del Puerto del Manglar en el Municipio de Culebra. Los detalles del plan de restauración deberán coordinarse previo al comienzo del proyecto.

Este endoso es solamente aplicable a la situación de hechos y los datos según presentados y evaluados en el caso. La Secretaria se reserva el derecho de reevaluar, variar o modificar el endoso en cualquier momento previo a la emisión de algún permiso o acción administrativa correspondiente por parte de la agencia solicitante o proponente cuando surja nueva información oficial específica estableciendo que el derecho aplicable o las condiciones ambientales en el área del proyecto han cambiado sustancialmente, o cuando el endoso original se emitió bajo premisas falsas o fraudulentas.

Cordialmente,



Nelson Velázquez Reyes
Secretario Auxiliar
Secretaría Auxiliar de Permisos, Endosos y Servicios Especializados

JCD/ARBR/jcd

Copia: Romel Pedraza
Autoridad de Puertos de Puerto Rico
PO Box 362829
San Juan, Puerto Rico 00936



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

November 12, 2015

F/SER47:JAR/pw

(Sent via Electronic Mail)

Colonel Jason A. Kirk, Commander
Jacksonville District Corps of Engineers, Antilles Office
Annex Building, Fundacion Angel Ramos, 2nd Floor, Suite 202
Franklin Delano Roosevelt Avenue #383
San Juan, Puerto Rico, 00918

Attention: Johann M. Sasso

Dear Colonel Kirk:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice SAJ-2002-01425 dated September 29, 2015. The Puerto Rico Ports Authority proposes to repair and improve the existing Sardinias Bay Cargo Ramp at the Culebra Ferry Terminal at Bahía de Sardinias and the Auxiliary Cargo Pier at San Ildefonso in Ensenada Honda Bay. The proposed work at the Sardinias Bay Cargo Ramp includes:

- Demolishing the existing concrete platform.
- Removing 27 existing H-piles at the mud line.
- Driving approximately 25 replacement piles of 20 inches in diameter over the existing Cargo Ramp footprint.
- Constructing the replacement Cargo Ramp of approximately 5,501 square feet.
- Installing a passenger boarding pier measuring approximately 10 feet wide by 100 feet long.
- Installing a catwalk and a mooring dolphin on the passenger ferry dock.

The proposed work at the San Ildefonso Auxiliary Facility includes:

- Demolishing the existing recreational dock and removing the existing 14-inch diameter concrete piles at the mud line.
- Installing a pre-fabricated floating aluminum dock (2,240 square feet) anchored to the bottom using six round concrete piles, 30 inches in diameter, driven into the bottom approximately 20 to 30 feet.
- Installing a pre-fabricated aluminum vehicular bridge-platform, measuring approximately 35 feet long by 22 feet wide with a gross area of 770 square feet to connect the pontoon dock to land.
- Installing pile caps and beams to protect the existing seawall.

The Jacksonville District did not include in the public a notice a determination on whether the proposed work would adversely affect essential fish habitat (EFH) or federally managed fisheries in the Caribbean. As the nation's federal trustee for the conservation and management of



marine, estuarine, and anadromous fishery resources, the NMFS provides the following comments and recommendations pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

The public notice includes brief results from a site-specific benthic survey. The report notes seagrass (*Thalassia testudinum*, *Syringodium filiforme*, and *Halophila decipiens*) occurs within the area and several species of scleractinian coral occur on the pilings and debris that would be removed. The extent of the seagrass impacts is not clear from the public notice, but the total acreage is presumed to be small. Impact minimization and compensatory mitigation at the Sardinias Bay Cargo Ramp and San Ildefonso Auxiliary Facility includes moving the four and five H-piles, respectively with coral colonies whose diameters are more than 10 centimeters to an appropriate nearby location, which would be determined in coordination with local personnel from the DNER and the NMFS.

The Caribbean Fishery Management Council (CFMC) identifies seagrass, coral, hardbottom, and sandy bottom as EFH under the fishery management plans for spiny lobster, queen conch, coral, or reef fish. These habitats serve as nursery areas for fishery species. Seagrass, hardbottom, and coral are part of a habitat complex that includes mangroves, and this complex supports a diverse community of fish and invertebrates. Seagrass also provides important water quality maintenance functions (such as pollution uptake), stabilize sediments, attenuate wave action, and produce and export detritus (decaying organic material), which is an important component of marine and estuarine food chains. Additional information about these EFH designations and how these habitats support fishery species is found in *Essential Fish Habitat (EFH) Generic Amendment to the Fishery Management Plans (FMPs) of the U.S. Caribbean*¹.

EFH Conservation Recommendations

Section 305(b)(4)(A) of the Magnuson-Stevens Act requires NMFS to provide EFH Conservation Recommendations for any federal action or permit which may result in adverse impacts to EFH. Therefore, NMFS recommends the following to ensure the conservation of EFH and associated fishery resources:

- Any permit issued for the proposed work should expressly note impacts to seagrass, coral, and hardbottom habitat are not authorized. The NMFS recommends the Jacksonville District request the applicant provide a scaled habitat map of the project area that focuses on seagrass, coral, and hardbottom and has the project features overlain onto the map.
- Any permit issued for the proposed work should require relocating all corals, to the extent practicable, from the project area to a safe location with similar ecological conditions.
- If the permit authorizes impacts to seagrass, coral, and hardbottom habitat, the permit should require compensatory mitigation for these impacts and monitoring of the mitigation should be required to gauge results with respect to clearly established performance criteria.

¹ Available at caribbeanfmc.com/fmp_efh.html.

Section 305(b)(4)(B) of the Magnuson-Stevens Act and implementing regulation at 50 CFR Section 600.920(k) require the Jacksonville District to provide a written response to this letter within 30 days of its receipt. If it is not possible to provide a substantive response within 30 days, in accordance with the “findings” with the Jacksonville District, an interim response should be provided to the NMFS. A detailed response then must be provided prior to final approval of the action. The detailed response must include a description of measures proposed by the Jacksonville District to avoid, mitigate, or offset the adverse impacts of the activity. If the response is inconsistent with the EFH conservation recommendations, the Jacksonville District must provide a substantive discussion justifying the reasons for not following the recommendations.

Species protected under the Endangered Species Act (ESA) and under the jurisdiction of the NMFS may occur in vicinity of the proposed dredging. Impacts to endangered or threatened species and their critical habitat may require consultation with the NMFS Protected Resources Division. Please direct questions about consultations under the ESA to Dr. Lisamarie Carrubba at Lisamarie.Carrubba@noaa.gov.

NMFS appreciates the opportunity to provide these comments. Please direct related questions or comments to the attention of Mr. José A. Rivera at NOAA HCD, c/o US Army Corps of Engineers, Annex Building, Fundacion Angel Ramos, 2nd Floor, Suite 202, Franklin Delano Roosevelt Avenue #383, San Juan, Puerto Rico, 00918. He may be reached by telephone at 787-405-3605 or by e-mail at Jose.A.Rivera@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: COE, Johann.M.Sasso@usace.army.mil
FWS, Michael_Evans@fws.gov
EPA, Casey.Jim@epa.gov
DPNR, JP.Oriol@dpr.gov.vi
CFMC, Graciela_CFMC@yahoo.com
F/SER3, Lisamarie.Carrubba@noaa.gov
F/SER4, David.Dale@noaa.gov
F/SER47, Jose.A.Rivera@noaa.gov



OCT 23 2015

Gabriel Hernández - Atkins Caribe, LLP
Metro Office Park
Lote 8 Calle 1, Suite 102
Guaynabo, Puerto Rico 00968

Estimado señor Hernández:

**Autoridad de los Puertos de Puerto Rico
Terminal Ferry Culebra
Reconstrucción y Reparación de Rampa
Playa Sardinias, Culebra
O-BD-CZM01-SJ-00530-17112014
Solicitud Conjunta Núm. 1397**

Acusamos recibo de los documentos radicados en respuesta a nuestra comunicación del 23 de septiembre de 2015, para el proyecto descrito en epígrafe. Luego de evaluar dichos documentos, tenemos los siguientes comentarios y/o requerimientos que deberán ser atendidos para continuar con la evaluación de su caso:

- mm*
1. En los documentos no se atiende el punto 1 de nuestra comunicación del 23 de septiembre de 2015. La misma indicaba que el tiempo correcto de mantenimiento de las boyas de anclaje propuestas como mitigación deberá ser mientras el terminal esté en operación, y no sólo por el tiempo de construcción y operación del terminal auxiliar. De igual manera, se le indicó que el DRNA no posee fondos para el mantenimiento de boyas, por lo que las boyas no deberán ser rotuladas como DRNA ya que no serán ni instaladas, ni pertenecerán, ni estarán dentro del plan de mantenimiento de boyas de amarre del DRNA.

En los documentos suministrados se plantea nuevamente que el DRNA o el Municipio de Culebra se harán cargo de las boyas. **El DRNA se reafirma en que las boyas propuestas, y su mantenimiento, son parte de una mitigación y responsabilidad del proponente.**

2. Las medidas propuestas para minimizar el impacto ambiental que tendrá la operación del ferry sobre las tortugas y manatíes debido al ruido, la turbidez y la contaminación por aceites, pintura y otros químicos asociados a la operación de la embarcación y sus motores no atienden nuestras preocupaciones. Al esto no ser atendido, tendría como consecuencia el desplazamiento de las especies de su hábitat. **Este tema sigue sin ser discutido satisfactoriamente en los documentos suministrados.**



3. Protocolo de trasplante de corales en San Ildefonso:

- a. El protocolo deberá incluir información de las 12 colonias de corales encontradas en los seis pilotes de la estructura que será demolida. Dichas colonias fueron identificadas anteriormente.
- b. Se propone relocalizar las colonias de coral con los pilotes, pero no se menciona como se evitará que al colocar dichos pilotes de forma solapada, no se ocasionen daños a dichas colonias.
- c. Los pilotes serán colocados junto a pilotes remanentes de una estructura anterior, localizada a unos pocos pies del área de construcción del nuevo terminal. Al dejar las colonias de coral dentro de la zona de operación del ferry, estarían expuestas a la re-suspensión de sedimentos durante las etapas de construcción y operación. **Las colonias deberán ser trasplantadas a otro lugar fuera del área de impacto.**
- d. **Se recomienda trasplantar las colonias de corales, no relocalizarlas con los pilotes.** Para esto, deberán ser removidas del pilote con mucho cuidado, y transportarlas a un lugar adecuado en el que puedan ser trasplantadas. De esta manera, se evitará que las colonias estén expuestas a los impactos del ferry. **Una vez removidas las colonias, los pilotes deberán ser removidos, ya que dejarlos en el lugar podría causar que con su deterioro se muevan e impacten otros sistemas marinos.**
- e. El monitoreo de las colonias de coral propuesto es muy general. El mismo **no cumple con los requisitos de un protocolo.**
 - i. Se debe hacer referencia a las colonias previamente identificadas.
 - ii. El crecimiento de los corales ramificados no debe ser medido con el método utilizado. Dichas medidas se deben hacer con regla o cinta métrica sin tocar el coral. Se podría utilizar el método de fotografía con escala, eliminando la necesidad de hacer medidas en el lugar.
 - iii. En el lugar donde se trasplantarán las colonias de coral se deberá marcar colonias de la misma especie existentes para que las mismas sirvan de control. De esta manera, se podrá evaluar si la sobrevivencia o mortandad de las colonias está asociada a un evento general en el arrecife, o al proceso de trasplante.

N 12

- iv. **El protocolo deberá ser revisado tomando en cuenta las recomendaciones mencionadas (e.i, e.ii y e.iii). También se deberá incluir el método de transporte de las colonias de coral al lugar donde se trasplantarán, el método para hacer el trasplante, el lugar donde serán trasplantadas y un método de monitoreo más detallado.**

4. Protocolo de trasplante de corales en Bahía Sardinas:

- a. El protocolo deberá incluir información de las 10 colonias de corales encontradas en los cuatro pilotes de la estructura que será demolida. Dichas colonias fueron identificadas anteriormente.
- b. Se propone relocalizar las colonias de coral con los pilotes, pero no se menciona como se evitará que al colocar dichos pilotes de forma solapada, no se ocasionen daños a dichas colonias.
- c. Los pilotes serán colocados a 30 metros de la rampa de carga del ferry, cercanos a la orilla de la playa adyacente a dicha rampa, con una profundidad de 10 pies. Al dejar las colonias de coral dentro de la zona de operación del ferry, estarían expuestas a la re-suspensión de sedimentos durante las etapas de construcción y operación. **Las colonias deberán ser trasplantadas a otro lugar fuera del área de impacto.**
- d. En los alrededores del lugar propuesto para localizar los pilotes, hay gran cantidad de hierbas marinas. Se menciona que los pilotes relocalizados no impactarán las hierbas marinas ni la colonia *Siderastrea siderea* presente en el lugar, pero no se provee información de cómo se llegó a tal conclusión, ni las medidas que se tomarán para que no ocurra tal impacto.
- e. **Las colonias de coral en los pilotes deberán ser trasplantadas a otro lugar fuera del área de impacto.**
- f. **Los pilotes deberán ser removidos, no dejados en la orilla representando un peligro a los bañistas que utilizan el área cuando el ferry no está en el terminal.**
- g. **Se recomienda trasplantar las colonias de coral, no relocalizarlas con los pilotes.** Para esto, deberán ser removidas del pilote con mucho cuidado, y transportarlas a un lugar adecuado en el que puedan ser trasplantadas. De esta manera, se evitará que las colonias estén expuestas a los impactos del ferry. Una vez removidas las colonias, **los pilotes deberán ser removidos**, ya que dejarlos en el lugar podría causar que con su deterioro se muevan e impacten las hierbas marinas, corales y/o representen un peligro para los bañistas que utilizan el área.

Nvz

h. El monitoreo de las colonias de coral propuesto es muy general. El mismo **no cumple con los requisitos de un protocolo.**

- i. Se debe hacer referencia a las colonias previamente identificadas.
- ii. El crecimiento de los corales ramificados no debe ser medido con el método utilizado. Dichas medidas se deben hacer con regla o cinta métrica sin tocar el coral. Se podría utilizar el método de fotografía con escala, eliminando la necesidad de hacer medidas en el lugar.
- iii. En el lugar donde se trasplantarán las colonias de coral se deberá marcar colonias de la misma especie existentes para que las mismas sirvan de control. De esta manera, se podrá evaluar si la sobrevivencia o mortandad de las colonias está asociada a un evento general en el arrecife, o al proceso de trasplante.
- iv. **El protocolo deberá ser revisado tomando en cuenta las recomendaciones mencionadas (h.i, h.ii y h.iii). También se deberá incluir el método de transporte de las colonias de coral al lugar donde se trasplantarán, el método para hacer el trasplante, el lugar donde serán trasplantadas y un método de monitoreo más detallado.**

5. Estudio de necesidades de boyas adicionales en Ensenada Honda:

- a. En el documento se discuten varias alternativas para garantizar la navegación segura del ferry y evitar conflictos con los usuarios del área. La alternativa 4.3.1 de colocar boyas adicionales en el canal de navegación no es favorecida por la Guardia Costanera. La medida se propone para evitar que otras embarcaciones anden en el canal de navegación, pero de por sí está prohibido. Además, esta alternativa acercaría embarcaciones a áreas llanas y con presencia de corales.
- b. La alternativa 4.3.2 establece el canal de navegación para llegar al terminal auxiliar. También se elabora como la alternativa 5.2. **Dicha alternativa se considera favorable para el proyecto ya que prevendría que otras embarcaciones obstruyan el paso del ferry al terminal.** La alternativa también indica que el mantenimiento de las boyas sea por el DRNA o por el Municipio de Culebra. **El DRNA no puede hacerse cargo de las acciones de mitigación de un proyecto sujeto al escrutinio de la propia agencia.** Además, al momento, el DRNA no tiene fondos para hacerse cargo de tales boyas.

- c. En cuanto a las boyas que regulan la velocidad, las alternativas que se discuten no consideran las boyas instaladas al presente. **Se recomienda revisar el estudio para que incluya la información de las boyas existentes y que se identifique otra entidad que no sea el DRNA para que se haga cargo del proceso de permisos y mantenimiento de las boyas.** El proceso de permiso conlleva un estudio bético del lugar en el cual se propone instalar los marcadores y boyas, al igual que un permiso del Cuerpo de Ingenieros y la Guardia Costanera de los Estados Unidos. Además, **la notificación a los nautas y la inclusión de los marcadores del canal de navegación en las cartas náuticas es un proceso con la Guardia Costanera, no con el DRNA.**

6. Monitoreo de peces y corales listados en la entrada canal de navegación de Ensenada Honda:

- a. El protocolo presentado es uno muy general que identifica la ubicación de las colonias de coral consideradas amenazadas, pero no menciona el mínimo de transectos que se llevarán a cabo.
- b. Se menciona que se utilizará el protocolo del género Acropora, pero no se identifica cuál de los protocolos, ya que para dicho género hay diferentes protocolos para diferentes objetivos.
- c. El protocolo indica que se documenta con video el transecto, pero la cantidad de datos que van a coleccionar es mínima.
- d. Los datos coleccionados con el protocolo propuesto no lleva a determinar los impactos por el paso del ferry, sólo documenta ciertas áreas del arrecife.
- e. **El protocolo deberá revisarse para que incluya todas las especies de corales, ya que a nivel estatal todas las especies de coral están protegidas. También se deberá evaluar el arrecife en su totalidad, no sólo donde hayan especies amenazadas, coleccionando datos de demografía y cobertura de coral, incluyendo detalles de la metodología que se utilizará y su análisis.**

7. Maniobras de entrada y salida del ferry de carga al terminal de San Ildefonso:

- a. El protocolo deberá indicar quién dará los adiestramientos que se proveerán anualmente a los capitanes.
- b. El protocolo deberá incluir que se tenga una imagen del mapa bético de Ensenada Honda a bordo en las embarcaciones, de forma que de ocurrir cualquier situación, los capitanes sepan identificar la localización de los recursos coralinos.

8. Monitoreo de turbidez y las hierbas marinas durante la operación del terminal auxiliar en San Ildefonso:

- a. El protocolo debería ser más preciso en cuanto al método que se utilizará para medir la turbidez y como se colocaría el instrumento que medirá dicha turbidez. De los diagramas presentados, pareciera que el turbidómetro se coloca muy cerca del fondo.
- b. Se propone llevar a cabo el monitoreo de turbidez en tres estaciones y hacer las lecturas antes, durante y después de atracar o salir el ferry en intervalos de 5 minutos, desde 15 minutos antes de que atraque el ferry hasta 45 minutos luego que la operación haya terminado.
- i. Se deberá indicar el periodo de tiempo que durará el monitoreo, si es por el tiempo de operación del ferry o por otro periodo distinto.
 - ii. Se deberá aclarar si el monitoreo será simultáneo en las tres estaciones, por lo que **necesitarían tres personas diferentes** encargadas de llevar a cabo el monitoreo en las estaciones.
 - iii. Las figura 3 muestra la ubicación de dos estaciones, pero no se ubica la tercera estación.
 - iv. La ubicación de las estaciones debe ser identificada con latitud y longitud.
 - v. **La ubicación de la estación en las hierbas marinas parece estar muy cercana a la orilla.**
- c. Los cuadrantes que serán utilizados para el monitoreo de las hierbas marinas no deben permanecer en el lugar ya que esto sería un impacto sobre ellas. **Los cuadrantes deben ser colocados al momento de colección de datos y removidos una vez concluido.**
- d. Se deberá especificar cuánto antes de que empiece la construcción del terminal se comenzará el monitoreo. **Se recomienda que sea por lo menos tres meses antes de comenzar la construcción del terminal.**
- e. El **monitoreo de hierbas marinas deberá hacerse hasta seis meses después que haya cesado la operación del terminal auxiliar del ferry**, no sólo su construcción, ni la construcción en Bahía Sardinias.

Nm

9. Monitoreo de turbidez durante la construcción del terminal del ferry de San Ildefonso:

- a. **El protocolo debería ser más preciso en cuanto al método que se utilizará para medir la turbidez y como se colocaría el instrumento que medirá dicha turbidez.** De los diagramas presentados, pareciera que el turbidómetro se coloca muy cerca del fondo.
- b. El monitoreo propuesto se llevará a cabo en tres estaciones, haciendo las lecturas antes de comenzar la construcción en la mañana, y en la tarde antes de terminar. **Se deberá añadir una tercera medida a medio día, para así poder detectar cualquier aumento en turbidez durante la construcción y así tomar las medidas correctivas correspondientes.** En la mañana la turbidez no debe ser muy alta debido a que aún no se han comenzado las operaciones, y en la tarde ya sería muy tarde para tomar acción ante un aumento de turbidez.
- i. Se deberá aclarar si el monitoreo será simultáneo en las tres estaciones, por lo que **necesitarían tres personas diferentes** encargadas de llevar a cabo el monitoreo en las estaciones.
- ii. **La ubicación de la estación en las hierbas marinas parece estar muy cercana a la orilla.**

10. Monitoreo de turbidez durante la construcción de la rampa del ferry en Bahía Sardinas:

- a. **El protocolo debería ser más preciso en cuanto al método que se utilizará para medir la turbidez.**
- b. El monitoreo de turbidez está propuesto a llevarse a cabo dentro y fuera de la cortina para sedimentos, pero no se indica cuántas estaciones habrán dentro y fuera de dicha cortina. **Se recomienda que sea en los tres lados de la cortina.**
- c. **Se deberá tener cortinas alrededor del "mooring dolphin" y "operation catwalk" propuestos al lado sur.** La figura 3 no muestra la colocación de cortinas.
- d. Esta área **se deberá monitorear con tres lecturas**, en la mañana antes de comenzar, al medio día, y en la tarde antes de terminar. Esto es para que de detectar cualquier cambio en turbidez, se puedan tomar las acciones correctivas correspondientes al momento.

Carta Información Adicional
Reconstrucción Terminal Ferry Culebra
O-BD-CZM01-SJ-00530-17112014
Playa Salinas, Culebra
Página 8 de 8

Para facilitar la evaluación de los documentos requeridos, los mismos deberán ser referidos a la Oficina de Secretaría de nuestro Departamento. Para cualquier información sobre su caso, deberá comunicarse directamente con la Sra. Ana R. Barea Rechani, Directora del Negociado de Permisos, al (787) 999-2200, extensión 2851 o 2815.

Cordialmente,



Nelson Velázquez Reyes
Secretario Auxiliar
Secretaría Auxiliar de Permisos, Endosos y Servicios Especializados

JCD/ARBR/jcd

Copia: Romel Pedraza - Autoridad de Puertos
P.O. Box 362829
San Juan, Puerto Rico 00936



21 de octubre de 2015

Ana R. Barea
Directora
Negociado de Permisos

Dra. Nilda M. Jiménez
Asesor Técnico
Negociado de Pesca y Vida Silvestre

SOLICITUD O-BD-CZM01-SJ-00530-17112014 PROYECTO CULEBRA FERRY TERMINAL

COMENTARIOS AL ESTUDIO DE NECESIDADES DE BOYAS ADICIONALES EN
ENSENADA HONDA Y LOS SIGUIENTES PROTOCOLOS: TRASPLANTE DE
CORALES EN SAN ILDEFONSO Y BAHÍA SARDINAS, MONITOREO DE PECES Y
CORALES EN ENSENADA HONDA, MANIOBRAS DE ENTRADA Y SALIDA DEL
FERRY DE CARGA AL TERMINAL DE SAN ILDEFONSO, MONITOREO DE
TURBIDEZ Y HIERBAS MARINAS DURANTE LA OPERACIÓN DEL TERMINAL
AUXILIAR EN SAN ILDEFONSO Y MONITOREO DE TURBIDEZ DURANTE LA
CONSTRUCCIÓN DEL TERMINAL AUXILIAR EN SAN ILDEFONSO Y DE LA
RAMPA DEL FERRY EN BAHÍA SARDINAS

Se recibieron un total de 7 protocolos en relación al proyecto de reconstrucción del terminal del ferry de carga en Bahía Sardinias, Culebra y la construcción de un terminal auxiliar para el ferry de carga en San Ildefonso, Ensenada Honda, Culebra. Además se recibió un análisis de necesidades en cuanto a rotulación adicional o colocación de boyas en Ensenada Honda. Cabe señalar que esto sólo atiende el punto dos y cuatro de la carta enviada el 23 de septiembre de 2015 al Sr. Gabriel Hernández de Atkins Caribe, LLP por parte del DRNA.

El punto dos, que aún no se ha atendido, se relaciona a la solicitud de que el DRNA se encargue o haga la mitigación correspondiente al proyecto, a través del mantenimiento de unas boyas de anclaje. En el pasado esta práctica se hizo y resultó en boyas abandonadas ya que el DRNA no tiene los fondos ni el personal para mantener las boyas instaladas al presente, menos hacerse cargo de aquellas que son parte de una mitigación y responsabilidad del proponente. El plan de necesidades plantea nuevamente que el DRNA o el municipio de Culebra se haga cargo de las boyas que



identifican necesarias. Más adelante se estará comentando dicho estudio, sin embargo reitero que esto es responsabilidad del proponente y forma parte del plan de mitigación. La agencia no puede llevar a cabo los planes de mitigación de otras entidades.

El punto tres de la carta tampoco se ha atendido. Este punto trata los proyectos de mitigación por el impacto del ferry en tortugas marinas y manatíes debido al ruido, turbidez y contaminantes. Es imposible pensar que el ferry entrando y saliendo de Ensenada Honda diariamente no va a tener un impacto sobre la vida silvestre del lugar. Es importante que se mitigue por estos impactos y al presente este tema sólo ha sido minimizado por el proponente.

A continuación los comentarios sobre los protocolos y el estudio de necesidades recibidos. Un comentario que aplica a todos los protocolos es que se debe enviar al DRNA copia de los informes producto de la implementación de estos protocolos.

TRASPLANTE DE CORALES EN SAN ILDEFONSO

Como parte del proceso de construcción del terminal auxiliar en San Ildefonso, la estructura del muelle recreacional va a ser demolida y reemplazada. La estructura que va a ser demolida posee 28 pilotes. En 6 de los 28 pilotes se observaron corales mayores de 10 cm. Se extrae de la información del protocolo que proponen remover los 28 pilotes y, como plan de trasplante de corales, los 6 pilotes que poseen corales los colocarían junto a pilotes remanentes de una estructura anterior, a unos pocos pies del área donde se estará construyendo el terminal.

Sería de beneficio que el protocolo incluyera información de las 12 colonias que se encontraron en los pilotes, ya que las mismas fueron identificadas previamente. La disposición propuesta de relocalizar los corales con todo y pilotes no menciona como van a evitar que al colocar los pilotes de forma solapada causen daño a las colonias de coral. Al dejar las colonias de coral dentro de la zona de operación del ferry, van a estar expuestas a la resuspensión de sedimentos durante la etapa de construcción y durante la operación del ferry. Estas colonias deben ser trasplantadas a otro lugar fuera del área de impacto.

Se recomienda que las colonias de corales sean trasplantadas, no relocalizadas con todo y pilote. Para trasplantarlas deben ser removidas, con cuidado, del pilote donde se encuentran adheridas, transportadas a un lugar adecuado y trasplantadas en dicho

lugar. De esta forma se evita que estén expuestas a los impactos del ferry. Una vez removidas las colonias de coral, deben remover los pilotes del área y no dejarlos como escombros, que eventualmente con el deterioro vayan a moverse impactando otros sistemas marinos.

Para el monitoreo de las colonias, el mismo es muy general. Está redactado como si fueran sugerencias de qué se debe hacer dependiendo de las circunstancias con varias alternativas y no como un protocolo que se está proponiendo. Las colonias fueron identificadas previamente por lo que se debe hacer referencia a las mismas. Se hace referencia a corales ramificados, si hay corales ramificados dentro de las colonias ha ser trasplantadas, el crecimiento no debe ser medido colocando una tira plástica con un tag sobre el coral. Se deben utilizar medidas con regla o cinta métrica sin tocar el coral. La foto con una escala es un método que se puede utilizar, sin necesidad de hacer medidas. En el lugar donde se van a trasplantar las colonias de corales, se deben marcar otras colonias de la misma especie que se está trasplantando, para que sirvan de control. De esta forma podrán evaluar si la sobrevivencia o mortandad de las colonias está asociada a un evento general que está ocurriendo en el arrecife o al proceso de trasplante.

Se recomienda por lo tanto que hagan una revisión del protocolo incorporando las recomendaciones hechas. El mismo debe incluir el método de transporte de las colonias de coral al lugar donde se van a trasplantar, método para trasplantar las colonias, el lugar donde las mismas se van a estar ubicando y un método de monitoreo más detallado.

TRASPLANTE DE CORALES EN BAHÍA SARDINAS

Como parte del proceso de reconstrucción del terminal del ferry en Bahía Sardinias, la plataforma existente va a ser demolida y reemplazada. La estructura que va a ser demolida posee 27 pilotes. En 4 de los 27 pilotes se observaron corales mayores de 10 cm. Se extrae de la información del protocolo que proponen remover los 27 pilotes y, como plan de trasplante de corales, los 4 pilotes que poseen corales los colocarían a 30 metros de la rampa de carga del ferry, básicamente en la orilla de la playa adyacente a dicha rampa, a una profundidad de 10 pies.

Sería de beneficio que el protocolo incluyera información de las 10 colonias que se encontraron en los pilotes, ya que las mismas fueron identificadas previamente. La propuesta de relocalizar los corales con todo y pilotes no menciona como van a evitar

que al colocar los pilotes de forma solapada causen daño a las colonias de coral. Al dejar las colonias de coral dentro de la zona de operación del ferry, van a estar expuestas a la resuspensión de sedimentos durante la etapa de construcción y durante la operación del ferry. En los alrededores de donde proponen ubicar los pilotes hay gran cantidad de hierbas marinas, según la información que suministra el proponente. Mencionan que los pilotes relocados no van a impactar las hierbas marinas ni la colonia de *Siderastrea siderea* que hay en el lugar, pero no proveen información de cómo llegaron a dicha conclusión o qué medidas van a tomar para que así sea. Las colonias de coral en los pilotes deben ser trasplantadas a otro lugar fuera del área de impacto y los pilotes removidos, no dejados en la orilla como escombros, representando un peligro a los bañistas que se sabe utilizan el área cuando el ferry no está en el terminal.

Se recomienda que las colonias de corales sean trasplantadas, no relocadas con todo y pilote. Para trasplantarlas deben ser removidas, con cuidado, del pilote donde se encuentran adheridas, transportadas a un lugar adecuado y trasplantadas en dicho lugar. De esta forma se evita que estén expuestas a los impactos del ferry y del proceso de construcción. Una vez removidas las colonias de coral, deben remover los pilotes del área y no dejarlos como escombros que eventualmente con el deterioro vayan a moverse impactando hierbas marinas y corales y representando un peligro a los bañistas que se sabe utilizan el área cuando el ferry no está en el terminal.

Para el monitoreo de las colonias, el mismo es muy general. Está redactado como si fueran sugerencias de qué se debe hacer dependiendo de las circunstancias con varias alternativas y no como un protocolo que se está proponiendo. Las colonias fueron identificadas previamente por lo que debe hacer referencia a las mismas. Se hace referencia a corales ramificados, si hay corales ramificados dentro de las colonias ha ser trasplantadas, el crecimiento no debe ser medido colocando una tira plástica con un tag sobre el coral. Se deben utilizar medidas con regla o cinta métrica sin tocar el coral. La foto con una escala es un método que se puede utilizar, sin necesidad de hacer medidas. En el lugar donde se van a trasplantar las colonias de corales, se deben marcar otras colonias de la misma especie que se está trasplantando, para que sirvan de control. De esta forma podrán evaluar si la sobrevivencia o mortandad de las colonias está asociada a un evento general que está ocurriendo en el arrecife o al proceso de trasplante.

Se recomienda por lo tanto que hagan una revisión del protocolo incorporando las recomendaciones hechas. El mismo debe incluir el método de transporte de las colonias de coral al lugar donde se van a trasplantar, método para trasplantar las colonias, el

lugar donde las mismas se van a estar ubicando y un método de monitoreo más detallado.

ESTUDIO DE NECESIDADES DE BOYAS ADICIONALES EN ENSENADA HONDA

Según informa el proponente, a solicitud del DRNA, se llevó a cabo un análisis de los canales de navegación existentes para establecer si era necesario colocar marcadores adicionales para que el ferry navegara de forma segura. Para este análisis se entrevistaron con la Guardia Costanera de los Estados Unidos y personal de la Autoridad de Transporte Marítimo.

El documento provee varias alternativas para garantizar la navegación segura del ferry y evitar posibles conflictos con usuarios en el área. Sobre la alternativa 4.3.1 de colocar boyas adicionales en el canal de navegación, es una opción que no es favorecida por la Guardia Costanera. El propósito de la medida es evitar que otras embarcaciones anclen en el canal de navegación, pero esto de por sí está prohibido, por lo que no debe ser un problema. Además, esta alternativa acercaría las embarcaciones a áreas donde hay corales y son llanas.

La alternativa 4.3.2 es una medida que establece el canal de navegación para llegar al terminal auxiliar. Esta medida es elaborada también como la alternativa 5.2. Es una medida que a su vez prevendría que otras embarcaciones estuvieran obstruyendo el paso del ferry al terminal, por lo que es considerada como muy favorable para el proyecto. Para llevar a cabo esta medida se requiere una permisología y proveer mantenimiento a las boyas que se colocarían. El proponente sugiere que el Municipio de Culebra o el DRNA se encargue de esto. Como mencionamos antes para el proyecto de mitigación de colocar 4 boyas, el DRNA no puede hacerse cargo de las acciones de mitigación de un proyecto sujeto al escrutinio de la propia agencia. A esto se le suma que al momento el DRNA no tiene fondos para mantener las boyas de las cuales la agencia es responsable, mucho menos hacerse cargo de las que colocaría otra agencia.

En cuanto a las boyas que regulan la velocidad, se discuten dos alternativas, pero sin considerar las boyas que están instaladas al presente. Se recomienda que este estudio sea revisado, incluyendo la información de las boyas existentes, que regulan la velocidad, en su análisis, e identificando otra entidad que no sea el DRNA para hacerse cargo del proceso de permisos y mantenimiento de las boyas. Se recuerda que el proceso de permiso conlleva un estudio béntico del lugar donde se plantea colocar los marcadores y boyas y un permiso del Cuerpo de Ingenieros y la Guardia Costanera de

los Estados Unidos; y que la notificación a los nautas e incluir los marcadores del canal de navegación en las cartas náuticas se hace con la Guardia Costanera, no con el DRNA.

MONITOREO DE PECES Y CORALES LISTADOS EN LA ENTRADA DEL CANAL DE NAVEGACIÓN EN ENSENADA HONDA

Este plan es para evaluar los impactos a las especies de corales amenazados y el mero cherna debido al paso frecuente o intenso del ferry por las cercanías del arrecife en la entrada del canal de navegación en Ensenada Honda. El protocolo presentado es uno muy general que identifica la ubicación de las colonias de coral consideradas amenazadas, ni tan siquiera menciona el mínimo de transectos que se van a llevar a cabo. Menciona que van a seguir el protocolo del género *Acropora*, pero no identifica cuál ya que hay varios protocolos con distintos objetivos. El protocolo básicamente documenta con video el transecto, pero la cantidad de datos que van a coleccionar es mínima. Como hemos mencionado antes, a nivel estatal todas las especies de corales están protegidas. Los datos coleccionados con el protocolo propuesto no lleva a determinar impactos por el paso del ferry, solo documenta ciertas áreas del arrecife. Se sugiere que este protocolo se revise para incluir todas las especies de corales, que se evalúe el arrecife en su totalidad, no solo las áreas donde hayan especies amenazadas, coleccionando datos de demografía y cobertura de coral e incluyendo detalles de la metodología que estarán utilizando y su análisis.

MANIOBRAS DE ENTRADA Y SALIDA DEL FERRY DE CARGA AL TERMINAL DE SAN ILDEFONSO

El protocolo menciona que los capitanes estarán recibiendo un adiestramiento anual para sensibilizarlos sobre los recursos del área y cómo operar la embarcación minimizando impactos a estos recursos. El protocolo debe identificar quién estará dando estos adiestramientos. De igual forma, el protocolo debería incluir tener una imagen del mapa béntico de Ensenada Honda a bordo de las embarcaciones, de forma que de ocurrir alguna situación, los capitanes sepan donde están los recursos coralinos.

MONITOREO DE TURBIDEZ Y HIERBAS MARINAS DURANTE LA OPERACIÓN DEL TERMINAL AUXILIAR EN SAN ILDEFONSO

El propósito de este monitoreo es detectar cambios en las hierbas marinas adyacentes al área del terminal auxiliar del ferry en San Ildefonso debido a la operación del mismo. El plan propuesto consiste en evaluar la turbidez del agua paralelo con el monitoreo de las hierbas marinas. Se provee información sobre varios equipos y alternativas para

medir la turbidez. El protocolo debería ser más preciso en el método que van a utilizar para medir la turbidez y cómo van a colocar el instrumento que mide la turbidez. De los diagramas presentados, pareciera que el turbidómetro está colocado demasiado cerca al fondo. El monitoreo de turbidez está propuesto a llevarse a cabo en tres estaciones y las lecturas se van a hacer antes, durante y después de atracar o salir el ferry en intervalos de 5 minutos, desde 15 minutos antes de que atraque el ferry hasta 45 minutos luego que la operación haya terminado. El documento debe indicar el periodo de tiempo que va a durar este monitoreo, si es por el tiempo que el ferry esté en operación o por un periodo distinto. Se debe aclarar si el monitoreo es simultáneo en las tres estaciones, de forma que tendrían que tener a tres personas encargadas de llevar a cabo dicho monitoreo en las distintas estaciones. La figura 3 muestra la ubicación de dos de las estaciones, pero no la tercera estación. La ubicación de las tres estaciones debe ser identificada, de ser posible con latitud y longitud. La ubicación de la estación en las hierbas marinas parece estar demasiado cerca a la orilla.

Sobre el monitoreo de las hierbas marinas mencionan que van a fijar cuadrantes para el monitoreo. Los cuadrantes no deben permanecer en el lugar ya que esto impactaría las hierbas marinas. Los cuadrantes deben ser colocados solo durante el momento de colección de datos y removidos inmediatamente luego. El monitoreo de hierbas marinas está propuesto para comenzar antes de que empiece la construcción del terminal. Luego va a llevarse a cabo cada tres meses hasta que se termine la reconstrucción de la rampa del ferry en Bahía Sardinias. Se debe especificar cuánto tiempo antes se va a comenzar el monitoreo. Se sugiere que sea por lo menos tres meses antes de comenzar la construcción del terminal en San Ildefonso. El monitoreo de hierbas marinas se debe hacer hasta seis meses después que haya cesado la operación del terminal auxiliar del ferry en San Ildefonso, no solo su construcción, ni la construcción en Bahía Sardinias.

MONITOREO DE TURBIDEZ DURANTE LA CONSTRUCCIÓN DEL TERMINAL DEL FERRY EN SAN ILDEFONSO

El propósito de este monitoreo es detectar cambios en turbidez en el área de construcción del terminal auxiliar del ferry en San Ildefonso. El documento provee información sobre varios equipos y alternativas para medir la turbidez. El protocolo debería ser más preciso en el método que van a utilizar para medir la turbidez y cómo van a colocar el instrumento que mide la turbidez en cada estación. De los diagramas presentados, pareciera que el turbidómetro está colocado demasiado cerca al fondo. El monitoreo de turbidez está propuesto a llevarse a cabo en tres estaciones y las lecturas se van a hacer antes de comenzar la construcción en la mañana y en la tarde antes de

terminar. Se debe añadir una tercera medida, a medio día, para poder detectar cualquier aumento en turbidez durante la construcción y tomar medidas correctivas. En la mañana quizás las operaciones no han comenzado y la turbidez no es alta y en la tarde cercano a culminar el día ya sería muy tarde para tomar acción ante un aumento de turbidez. Se debe aclarar si el monitoreo es simultáneo en las tres estaciones, de forma que tendrían que tener a tres personas encargadas de llevar a cabo dicho monitoreo en las distintas estaciones. La ubicación de la estación en las hierbas marinas parece estar demasiado cerca a la orilla.

MONITOREO DE TURBIDEZ DURANTE LA CONSTRUCCIÓN DE LA RAMPA DEL FERRY EN BAHÍA SARDINAS

El propósito de este monitoreo es detectar cambios en turbidez en el área de construcción de la rampa del ferry en Bahía Sardinias. El documento provee información sobre varios equipos y alternativas para medir la turbidez. El protocolo debería ser más preciso en el método que van a utilizar para medir la turbidez. El monitoreo de turbidez está propuesto a llevarse a cabo dentro y fuera de la cortina para sedimentos, pero no indica cuántas estaciones dentro y fuera de la cortina va a haber. Se sugiere que sea en los tres lados de la cortina. La figura 3 no muestra que se vayan a colocar cortinas para sedimentos alrededor del "mooring dolphin" y "operation catwalk" que está propuesto en el lado sur, y debería tener cortinas. Esta área debería ser monitoreada de igual forma. Las lecturas se van a hacer antes de comenzar la construcción en la mañana y en la tarde antes de terminar. Se debe añadir una tercera medida, a medio día, para poder detectar cualquier aumento en turbidez durante la construcción y tomar medidas correctivas. En la mañana quizás las operaciones no han comenzado y la turbidez no es alta y en la tarde cercano a culminar el día ya sería muy tarde para tomar acción ante un aumento de turbidez.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Caribbean Islands National Wildlife Refuge
P.O. Box 510, Carr. 301, Km. 5.1
Boqueron, Puerto Rico 00622

September 28, 2015

Mr. Jorge Suárez Pérez-Guerra
Auxiliary Executive Director
Planning, Engineering and Construction
Puerto Rico Ports Authority
P.O. Box 362829
San Juan, Puerto Rico 00936-2829

Re: Rehabilitation of Culebra Cargo Pier
Culebra, Puerto Rico

Dear Mr. Suárez Pérez-Guerra:

This is in response to your letter of June 11, 2015 addressing our concerns on the above referenced proposed project expressed in our letter dated May 7, 2015 and those provided in a meeting with Mr. Francisco Aguiló (Atkins), Ms. Milagros Rodríguez (PR Ports Authority), and Mr. José Ayala (FEMA). As we mentioned previously, our concerns are mainly about the proposed construction of a new auxiliary cargo facility in the San Idelfonso area, Culebra, P.R.

In our letter and meeting, we specifically mentioned that as per the Quitclaim Deed document of 1982, the project site will be located in Tract (1k) which was agreed upon by both governments to be utilized only for public park and public recreational purposes. In your letter, you mentioned that you have consulted with the U.S. Department of the Interior (DOI) and they have responded with a no objection to the proposed action and that the P.R. Ports Authority is drafting amendments to the Quitclaim Deed for the DOI perusal and execution. We have consulted with our Regional Solicitor regarding your request. In his response, he has determined that an amendment to the Quitclaim Deed is not necessary but emphasized the Service will need to continue participation in NEPA and other environmental compliance activities.

We have also expressed the need for the Culebra National Wildlife Refuge and other federal and Commonwealth agencies to continue using the existing ramp and pier facilities currently existing adjacent to the project site. As we have previously stated, the access to this ramp and dock area is essential to fulfilling the mission of the Culebra NWR. We also mentioned that the development and operations of the cargo ferry facilities seemed to interfere with docking and launching of official boats used by different agencies, more specifically due the proposed location of a parking area in front of the facilities which may interfere with the boat launching maneuvering. In response to these concerns, you clarified that the proposed works does not include any modifications to the existing ramp and a gate that was included in the project

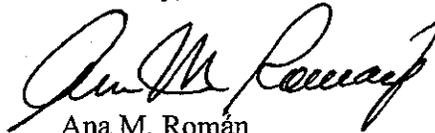
**TAKE PRIDE[®]
IN AMERICA** 

drawings at the entrance of the area was removed. Regarding the parking concerns, the number of spaces was reduced to four and instead of being labeled "Staging Parking" it will be labeled as "For Official Vehicles Only". We don't believe that changing the designation of the parking spaces will minimize the interference that these vehicles could cause to the maneuvering of launching boats. It is our recommendation, that the area along the wall facing the waterfront be designated as a no parking area.

Finally, we appreciate your response and clarifications to our concerns about this project. We recognize the need to meet with project contractors and all stakeholders to clarify all these points. We look forward to have this meeting prior to project construction. Please provide information on the project status at this time.

If you have any questions, please contact me at (787) 851-7258, extension 305, or Susan Silander, Caribbean Islands NWR Complex Project Leader at extension 306.

Sincerely,



Ana M. Román
Deputy Project Leader
Caribbean Islands NWR and
Culebra NWR Manager

Cc:
USCOE, Regulatory Section, San Juan
PRDNER, San Juan
ACDEC, Culebra
Municipality of Culebra
CESFO, Boquerón
NOAA, Boquerón
OGPe, San Juan
FEMA, San Juan



SEP 23 2015

Gabriel Hernández - Atkins Caribe, LLP
Metro Office Park
Lote 8 Calle 1, Suite 102
Guaynabo, Puerto Rico 00968

Estimado señor Hernández:

Autoridad de los Puertos de Puerto Rico
Terminal Ferry Culebra
Reconstrucción y Reparación de Rampa
Playa Sardinias, Culebra
O-BD-CZM01-SJ-00530-17112014
Solicitud Conjunta Núm. 1397

Acusamos recibo de los documentos radicados en respuesta a nuestra comunicación del 18 de junio de 2015, para el proyecto descrito en epígrafe. Luego de evaluar dichos documentos, tenemos los siguientes comentarios y/o requerimientos que deberán ser atendidos para continuar con la evaluación de su caso:

1. El plan de mitigación propone la instalación de 4 boyas de anclaje y darle mantenimiento por 5 años. El tiempo correcto de mantenimiento deberá ser mientras el terminal esté en operación, y no sólo por el tiempo de construcción y operación del terminal auxiliar. De igual manera, se propone que las boyas se rotulen "DRNA Day Use Only". El DRNA no posee fondos para el mantenimiento de boyas, por lo que las boyas no deberán ser rotuladas como DRNA ya que no serán ni instaladas, ni pertenecerán, ni estarán dentro del plan de mantenimiento de boyas de amarre del DRNA.
2. Previo a la implementación de los protocolos y de llevar a cabo los estudios de necesidades, los mismos deberán ser suministrados para que sean evaluados y aprobados por el DRNA.
3. Las medidas propuestas para minimizar el impacto ambiental que tendrá la operación del ferry sobre las tortugas y manatíes debido al ruido, la turbidez y la contaminación por aceites, pintura y otros químicos asociados a la operación de la embarcación y sus motores no atienden nuestras preocupaciones. Al esto no ser atendido, tendría como consecuencia el desplazamiento de las especies de su hábitat.

A continuación presentamos algunas medidas de mitigación:

- a. Una posible medida de mitigación para la contaminación por ruido en el ambiente marino podría ser proveer mantenimiento a las boyas de regulación de velocidad de las embarcaciones que están en el área.



SEP 23 2015

Carta Información Adicional
Reconstrucción Terminal Ferry Culebra
O-BD-CZM01-SJ-00530-17112014
Playa Salinas, Culebra
Página 2 de 2

- b. Otra posible alternativa es que se auspicien censos aéreos que permitan contabilizar y ver la distribución de manatíes y tortugas en el área de Culebra. Este tipo de estudio aporta al conocimiento sobre dichas especies, y ayudaría a detectar cualquier cambio poblacional debido a las operaciones del ferry.
 - c. El paso frecuente del ferry sobre las áreas arrecifales cercanas afectaría las especies coralinas. Para mitigar por dicho impacto, se sugiere llevar a cabo anualmente, mientras el ferry esté en funcionamiento, un evento de trasplante de colonias de las fincas de corales al arrecife. Esto ayuda a restaurar el arrecife y las poblaciones de especies de corales consideradas amenazadas.
4. El plan de relocalización de las colonias de corales mayores de 10 cm que se indica serán impactadas por el proyecto deberá incluir todas las especies de corales, no sólo las especies listadas a nivel federal.

Para facilitar la evaluación de los documentos requeridos, los mismos deberán ser referidos a la Oficina de Secretaría de nuestro Departamento. Para cualquier información sobre su caso, deberá comunicarse directamente con la Sra. Ana R. Barea Rechani, Directora del Negociado de Permisos, al (787) 999-2200, extensión 2851 o 2815.

Cordialmente,



Nelson Velázquez Reyes
Secretario Auxiliar
Secretaría Auxiliar de Permisos, Endosos y Servicios Especializados

JCD/ARBR/jcd

Copia: Romel Pedraza - Autoridad de Puertos
P.O. Box 362829
San Juan, Puerto Rico 00936



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Caribbean Ecological Services

Field Office

P.O. Box 491

Boqueron, PR 00622

SEP 02 2015

In Reply Refer To:
FWS/R4/CESFO/72049-028

Mr. Alejandro De La Campa
Disaster Recovery Officer
FEMA
PO Box 70105
San Juan, Puerto Rico 00936-8105

Re: HGMP FEMA-DR4017-PR,
Rehabilitation of Culebra Cargo and
Passenger Pier, Culebra Island, Puerto Rico

Dear Mr. De La Campa:

This is in reply to your August 14, 2015 letter regarding the meeting held May 21, 2015 with FEMA and Puerto Rico Port Authority (PRPA) personnel. The May meeting was to discuss the Service's comments regarding the rehabilitation of the marine facilities in the Municipality of Culebra Island and possible impacts to the listed Virgin Island boa *Epicrates monensis grantii*. Our comments are issued in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the Endangered Species Act (16 U.S.C. 1531 et seq. as amended).

In order to minimize possible adverse effects to the VI boa, FEMA is proposing the following:

- 1) The upland areas of the new facilities at San Idelfonso will be evaluated to determine if suitable VI boa habitat is present.
- 2) Boa habitat suitability will be reported to the Fish and Wildlife Service.
- 3) The PR Ports Authority and their contractors will implement conservation measures outlined in our March 2015 letter to minimize adverse effects on the VI boa.
- 4) Based on the above, FEMA has determined that the proposed actions may affect but are not likely to adversely affect the VI boa.

Based on the May meeting and the information provided, we concur with your determination that the proposed work in San Idelfonso may affect but is not likely to adversely affect the VI boa. Nevertheless, if the project is modified or if information on impacts to listed species becomes available this office should be contacted concerning the need for the initiation of consultation under section 7 of the Act.

Please be advised that in addition to impacts to federally listed species, the Service had other concerns regarding the project such as cumulative and chronic impacts to marine ecosystems, use of the facilities for other purposes and guaranteed access of Service boats and vehicles. PRPA had proposed resolving those through possible deed restrictions, or use restrictions. These concerns are still pending.

Thank you for the opportunity to comment on these documents, if you have any questions please contact Felix Lopez of my staff at 787 851-7297 x 210.

Sincerely,



Edwin E. Muñiz
Field Supervisor

fhl
cc:
COE, San Juan
DNER, San Juan
Mr. José Ayala, FEMA
PRPB, San Juan (CZ-2015-1120-050)
FWS, Refuges
FWS, Culebra NWR



ATKINS Caribe, LLP
Metro Office Park
Eight 1st Street Suite 102
Guaynabo, Puerto Rico 00968-1717

Telephone: +1 (787) 294-2010
Fax: +1 (787) 294-2002

<http://www.atkinsglobal.com/northamerica>

August 18, 2015

Eng. Sindulfo Castillo
Chief Antilles Regulatory Section
U.S. Army Corps of Engineers
Jacksonville District
400 Fernández Juncos Avenue
San Juan, Puerto Rico 00901-3299

Attn.: Eng. Johann M. Sasso, Project Manager

Re: Culebra Ferry Terminal Improvements-Sardinas Bay Cargo Ramp Reconstruction and Auxiliary Cargo Ramp at San Ildefonso SAJ -2002-01425 (SP-JMS), Culebra, Puerto Rico

Dear Mr. Castillo:

Atkins, on behalf of the Puerto Rico Ports Authority (PRPA), respectfully presents the information requested by Project Manager Eng. Johann M. Sasso, on the letter dated May 8, 2015. The information provided follows the same chronological order of the previously received communication.

National Environmental Policy Act Process

The proposed project is currently undergoing the final stages of the NEPA process with the Federal Emergency Management Agency (FEMA) as the proponent agency, which started on August, 2014. At this point, state and federal agencies and stakeholders of the Municipality of Culebra have presented their comments and concerns towards the potential impacts of the project; therefore, based on their participation, plans on mitigation, attenuation and/or avoidance of potential impacts have been considered, addressed and presented in this letter.

1.0. Description and Narratives:

1.1A. Provide a more detailed description of the project proposed:

*The proposed action includes the reconstruction of the **Culebra Ferry Terminal Cargo Ramp in Sardinas Bay**, which consists of:*

- *The removal of approximately 27 existing 15 x 15 inch H-piles at the mudline,*
- *Demolishing the existing concrete platform, which measures approximately 4,907 square feet,*
- *Driving approximately 25 replacement piles of 20 inches in diameter over the existing Cargo Ramp footprint, and,*
- *Constructing the replacement Cargo Ramp of approximately 5,501 square feet.*
- *Installing a passenger boarding pier measuring approximately 10 feet wide by 100 feet long for passengers to safely board and disembark the cargo ferries.*
 - *This passenger boarding pier will be attached at one end to a mooring dolphin, which will also serve for improved docking safety and usability of the Cargo Ramp. For this upgrade, approximately three pilings of 20 inches in diameter will be located (one every 25 feet) under passenger boarding ramp, and five pilings of 20 inches in diameter will support the mooring dolphin.*
- *Installing a catwalk and a mooring dolphin on the passenger ferry dock, which will serve for improved docking safety and allow the full usability of the passenger dock facilities.*
 - *This catwalk will measure 4 feet in width and 25 feet in length. It will be used to provide access to the mooring dolphin for the PRMTA (Puerto Rico Marine Transportation Authority) employee in charge of assisting with the docking of the ferry.*
 - *The mooring dolphin will measure 10 x 10 feet and will be supported by five pilings of 20 inches in diameter.*

There is insufficient room at the terminal to reconstruct the Cargo Ramp and continue ferry operations; therefore, the action also includes the construction of an **Auxiliary Cargo Ferry Facility in San Ildefonso**, which consists of:

- *The installation of a pre-fabricated floating aluminum dock (pontoon dock) that will match freeboard ferryboat highs and ease loading and unloading activities.*
 - *This floating pontoon dock will have a length of 40 feet by a width of 56 feet, with an approximate gross area of 2,240 square feet (208.2 square meters).*
 - *The floating pontoon dock will be anchored to the bottom using six round concrete piles with a 30-inch diameter, driven into the bottom approximately 20 to 30 feet below msl. These concrete piles will hold the floating dock in place.*
- *A pre-fabricated aluminum vehicular bridge-platform, measuring approximately 35 feet long by 22 feet wide with a gross area of 770 square feet (71.5 square meter) will connect the pontoon dock to land.*
 - *Due to its unsafe structural conditions, the existing recreational dock will be demolished and replaced with this new prefabricated aluminum dock supported by eight steel encased concrete piles with an 18-inch diameter. The area that will be occupied by this new dock will be the same as the existing one (approximately 41x11 feet (451 square feet). The existing 14-inch diameter concrete piles will be removed at the mudline.*
- *An aluminum passenger boarding pier will connect the new replacement pier and the pontoon dock. Measuring 20 feet in length by 4 feet in width (80 square feet, or 7.4 square meters), the boarding ramp will allow passengers to board and disembark the cargo ferry separately from vehicular loading and unloading.*
- *A pile cap and fender measuring approximately 56 feet in length by 6 feet in width (336 square feet, or 31.2 square meters) will be supported by eleven round concrete piles with a diameter of 30 inches. This pile cap beam will protect the floating pontoon dock from impacts by the cargo ferry during docking maneuvers. The stern of the cargo ferry will be tied to the steel bollards in the pile cap.*
- *This pile cap beam will be located at a distance of 64 feet from the existing seawall at a MSL depth of 16 feet.*

- *To protect the existing historical seawall, a pile cap beam measuring 3 feet wide by 29 feet long, supported by six concrete piles with a diameter of 18 inches will be constructed at a distance of approximately 5 feet from the existing seawall.*
- *No dredging works will be necessary to meet the required operational depth for the cargo ferry.*
- *Landside improvements related to the development of this facility will include construction of required facilities such as ticket booths, upgrading the parking area, and road improvements.*
- *These upgrades will not impact any wetland areas or existing drainages.*

1.1B. Purpose and need for the project:

The PRPA conducted a structural evaluation at the Culebra Ferry Terminal in Sardinas Bay on August 2010 and November 2013. Advanced deterioration was observed in the deck slab and concrete beams, which has probably spread to the entire concrete surface. This appears to be a result of storm events, hurricanes and the wave action. While it may be possible to patch and repair the deteriorated structure, any repairs attempted for this facility would be of short-term duration. Furthermore, if the repair and reconstruction of the cargo terminal is not conducted promptly, structural failure may occur.

Due to space limitations, it is not feasible to continue cargo operations at the Sardinas Bay Terminal Facility during its rehabilitation. Being the only heavy commercial cargo transportation port in Culebra, the cargo ferry provides an essential service to the residents of the island. Therefore, an evaluation of potential sites for a temporary facility was undertaken, and the San Ildefonso site would pose fewer impacts since no dredging is required and the landside has been previously developed for over 100 years.

The purpose for adding the passenger ferry dock mooring dolphin in Sardinas Bay is to allow the use of the Passenger Ferry Terminal (located on the south side of the Culebra Ferry Terminal) to board and un-board passengers from the passenger ferries, particularly Cayo Blanco, which commonly operates the passenger route to Culebra. The necessary mooring support is presently absent for such large ferries (Cayo Blanco has a LOA¹ of 150 feet) at this location. Given the depth limitations at this location, such ferries would not have the necessary support for a safe mooring at this terminal; however, the installation

¹ LOA: Length overall

of a new mooring dolphin will provide the necessary support. A catwalk will connect the passenger terminal to the mooring dolphin, which will allow access for PRMTA personnel to secure the arriving ferry to the mooring dolphin.

The purpose for adding the passenger boarding pier to the reconstructed cargo ramp is to allow the boarding and un-boarding of passengers from the cargo ferries without the interference with the operation of the cargo ramp, as this practice is not allowed under US Coast Guard regulations. In addition, the mooring dolphin allows the bow of the cargo ferry to be moored firmly, limiting the lateral movement of the cargo ferry and lessening the force applied to the stern during mooring.

1.1C. Description of the proposed impacts (both temporary and permanent):

Temporary Impacts:

- **Air Quality:** *During the reconstruction of the Cargo Ramp in Sardinas Bay and the Auxiliary Cargo Facility in San Ildefonso, temporary impacts to air quality from fugitive dust during the construction are expected to occur, as well as emissions from fossil fuel burning internal combustion engines used in heavy equipment, construction vehicles and boats, which are considered mobile sources. These emissions are of short duration, of intermittent occurrence, and are anticipated to cause localized, increases in criteria pollutant concentrations in the area, mainly because of the Trade Winds and convection currents that continuously bring fresh, clean ocean air.*
- **Underwater Noise:** *The proposed action includes pile driving for the Sardinas Bay terminal. All pile-driving/installation within San Ildefonso will use the auger drilling method, among other reasons, to minimize noise and vibration impacts in this sensitive area. Drilling generates substantially lower noise and sound pressures than impact pile-driving and even vibratory hammers (CDOT, 2009; Dazey, et al., 2012). Pile drilling has been proposed in Sardinas Bay; however, it is up to the contractor to determine which method is more suitable.*

Potential impacts on sea turtles and manatees were considered, but given the mobility of these, we expect them to move away from noise disturbance at Sardinas Bay. Furthermore, since there is no foraging habitat within the project footprint, even though

there are foraging areas in adjacent areas of Ensenada Honda, we believe this behavioral effect will not be hazardous. There are no restraining barriers in the area, so individuals of the listed species are free to move. If an individual chooses to remain within the behavioral response zone, it could be exposed to behavioral noise impacts during pile installation. Finally, pile-driving will occur only during the day, green or hawksbill sea turtles and the manatee will be able to resume normal activities during quiet periods between pile installations and at night. For the above-mentioned reasons, we anticipate any adverse effects from underwater noise and vibration will be insignificant during construction.

- **Water Quality:** *Temporary impacts on surface waters of Sardinas Bay and Ensenada Honda could occur during the demolition of the existing dock and during the construction of the proposed dock, particularly from runoff and increased turbidity due to re-suspended sediments. No dredging activities are proposed for the project as a whole. The placement of turbidity barriers would limit the reach of suspended sediments into the outer bay in both Sardinas Bay and Ensenada Honda. Potential impacts to surface water quality that may result from pile driving operations, stormwater runoff from construction areas, and potential spills will be controlled with the implementation of Spill prevention and Countermeasures Plan and Sediment and Erosion Control Plan.*
- **Aquatic Habitats:** *The construction barge in Sardinas Bay will be positioned in a location that will not impact or shade seagrasses and corals, including the large siderea colony and corals that are located on the seawall. Barge anchoring/spudding locations will also be selected to avoid impacting these benthic resources. Sediment re-suspension resulting from construction operations (approximately six months) might also affect fish and wildlife, limiting primary productivity and by mechanically choking gas exchange in smaller organisms. No dredging activities are proposed for the two sites. The use of turbidity barriers will control the dispersion of re-suspended sediments. For San Ildefonso, land-based erosion and sedimentation from the grading and widening of the existing access road and the construction of approximately 30 parking spaces may enter the bay, which may impact the quality of the water. Erosion/sedimentation controls will be implemented to minimize this potential impact. Although the cargo ferry maneuvers might increase turbidity due to re-suspended*

sediments, this will be a temporary (approximately seven months) operation during the construction of the Auxiliary Cargo Ramp Facility. Habitats are not anticipated to be degraded from these activities. In addition, to lessen impacts from sediment uplift, the PRMTA will work on an Approach and Departure Protocol for ferries approaching the Auxiliary Cargo Facility at San Ildefonso as part of the Mitigation Plan.

Permanent Impacts:

- **Water Quality:** *During the operation of the Auxiliary Facility in Ensenada Honda, negative water quality effects include the re-suspension of sediments during docking/undocking maneuvers of the cargo ferry. However, the propellers on the cargo ferries have a mid-rear location on the ship that, once docked to the platform, will be in at least 17 to 18 feet of water. After the reconstruction of the Cargo Ramp in Sardinas Bay is completed, the cargo ferry service will be restored to the existing terminal, and the use of the Auxiliary Cargo Facility at San Ildefonso will be limited to a back-up terminal. Therefore, water quality is not expected to be affected after the construction and operation of the project.*
- **Aquatic Habitats:** *In Sardinas Bay, four of the cargo ramp H-piles have coral colonies with a diameter of more than 10 centimeters. These pilings will also be cut at the mudline and moved to a nearby location, which will be determined in coordination with local personnel from the DNER and the NMFS. The placement of the pilings on the bottom substrate will impact approximately 0.0009 acres (41.25 square feet). Five of the pilings from the existing recreational dock in San Ildefonso have the presence of coral colonies. Although these colonies are not listed under the ESA, they are over 10 centimeters in diameter. Their relocation will be determined in coordination with local personnel from the DNER and the NMFS. Potential alternatives to date include leaving the pilings in place, relocating them to an adjacent location directly offshore from their existing location, and placing them in an adjacent location as part of the riprap/concrete slab just east of the existing pier in San Ildefonso. The placement of these pilings on the soft bottom substrate will impact approximately 0.0014 acres (62.42 square feet).*

In addition to the aforementioned construction, the existing upland areas near the Auxiliary Cargo Facility at San Ildefonso will require various modifications. These include modifications of the existing access road to the required width with a loop lane that will allow an uninterrupted flow of traffic and the creation of approximately 30 parking spaces.

No dredging will take place for this portion of the project.

1.1D. Extent of proposed impacts to jurisdictional areas:

- **Sardinas Bay Cargo Ramp:** *Proposed Impacts to jurisdictional areas are limited to previously impacted open water areas in the Caribbean Sea (Sonda de Vieques) and an additional 1,300 ft² from two catwalks and two mooring dolphins. Pilings with coral colonies adhered to will be cut and relocated. The placement of these pilings on the bottom substrate will impact approximately 0.0009 acres (41.25 square feet). Their final location will be determined in coordination with local personnel from the DNER and the NMFS.*
- **San Ildefonso Auxiliary Cargo Facility:** *Proposed Impacts to jurisdictional areas are limited to approximately 3,426 ft² that are part of the floating pontoon dock, its support pilings, vehicular bridge, and the pile cap & fender structures. Five of the existing recreational dock pilings with coral colonies will be removed and relocated. Potential alternatives to date include leaving the pilings in place, placing them in an adjacent location as part of the riprap/concrete slab just east of the existing pier in San Ildefonso, or remove and relocate each colony to the existing pilings that are part of the riprap/concrete slab just east of the existing pier in San Ildefonso. Their final location will be determined in coordination with local personnel from the DNER and the NMFS. The placement of these pilings on the soft bottom substrate will impact approximately 0.0014 acres (62.42 square feet).*

1.1E. Breakdown of the acreage and linear impacts proposed on WOTUS (Waters of the United States), itemized for impacts for each structure and work:

Sardinas Bay Cargo Ramp (permanent impacts)

	Structure Permanent Impacts	*Area of Shadow Cast Over Bottom	*Pilings Permanent Impacts	Footprint/Area
Sardinas Bay Cargo Ramp	New Cargo Ramp	594 ft ²	Cargo Ramp	54.3 ft ²
	Cargo Ramp Catwalk (passengers)	1,000 ft ²	Cargo Ramp Catwalk (passengers)	5.3 ft ²
	Operations Catwalk	100 ft ²	Mooring Dolphin	10.9 ft ²
	Cargo Ramp Catwalk Mooring Dolphin	100 ft ²	Mooring Dolphin	10.9 ft ²
	Operations Catwalk Mooring Dolphin	100 ft ²	Relocation of Pilings with Corals	41.25 ft ²
	Relocation of Pilings with Corals	*not applicable		
Totals		‡1,894 ft² (0.04 acres)		122.6 ft² (0.0028 acres)

*Soft Bottom, No Seagrass Beds

‡Total area does not include pilings

San Ildefonso Auxiliary Cargo Facility (permanent impacts)

	Structure Permanent Impacts	*Area of Shadow Cast Over Bottom	*Pilings Permanent Impacts	Footprint/Area
San Ildefonso Auxiliary Cargo Facility	Floating pontoon dock	2,240 ft ²	Pile Cap & Fender Pilings	53.9 ft ²
	Pile cap & fender	336 ft ²	Pontoon Dock Pilings	29.4 ft ²
	Vehicular Bridge	770 ft ²	Pile Cap Beam (seawall)	10.6 ft ²
	Passenger Boarding Ramp	80 ft ²	Recreational Dock Pilings	14.1 ft ²
	Pile Cap Beam (seawall)	87 ft ²	Relocation of Pilings with Corals	62.42 ft ²
	Relocation of Pilings with Corals	*not applicable		
Totals:		‡3,426.0 ft² (0.078 acres)		170.42 ft² (0.003 acres)

*Soft Bottom, No Seagrass Beds

‡Total area does not include pilings

**The vehicular bridge will rest on top of the beam; no additional impacts (shadow) will occur

The only temporary impacts to jurisdictional areas are re-suspension of sediments due to pile driving.

1.1F. Type of fill material:

Fill material for both locations consist of concrete and steel-reinforced bars.

Sardinas Bay Cargo Ramp: *Approximately 25 replacement piles, 20 inches in diameter would be driven over the existing Cargo Ramp footprint. In order to upgrade to current safety codes and standards, a passenger boarding catwalk is to be constructed allowing passengers arriving in the cargo ferry to disembark separately from the areas used to load and unload vehicles. This catwalk would be attached at one end to a mooring dolphin, which will also serve for improved docking safety and usability of the Cargo Ramp. For this upgrade, approximately 3 pilings 20 inches in diameter (steel casing filled with concrete) will be added. Each mooring dolphin would employ five pilings of 20 inches. Four of the existing cargo ramp H-piles have coral colonies. These pilings will be cut and moved to a nearby location, which will be determined in coordination with local personnel from the DNER and the NMFS. The placement of the pilings on the bottom substrate will impact approximately 0.0009 acres (41.25 square feet).*

San Ildefonso Auxiliary Cargo Facility: *Six round concrete piles with a diameter of 30 inches, driven into the bottom 20 to 30 feet below msl. Eleven round concrete piles measuring 30 inches will be used to place a pile cap and fender that will measure approximately 56 feet in length by 6 feet in width (336 square feet). Eight steel encased concrete piles with an 18-inch diameter will be part of the reconstruction of the recreational dock. A second, smaller pile cap beam measuring 29 feet in length by 3 feet in width will be held in place by six concrete piles of 18 inches in diameter. Five of the pilings from the existing recreational dock in San Ildefonso have the presence of coral colonies. These pilings will be relocated in coordination with local personnel from the DNER and the NMFS. The placement of these pilings on the bottom substrate will impact approximately 0.0014 acres (62.42 square feet).*

1.1G. Quantify the extent of impact associated with each of these post-development land use types for the current site plan:

Sardinas Bay Cargo Ramp: *No long-term impacts associated with the reconstruction of the cargo ramp and catwalks are expected to occur at the site, given that the site is and has been the only ferry terminal in the island of Culebra.*

San Ildefonso Auxiliary Cargo Facility: *Post development impacts associated to the use of the Auxiliary Facility may be limited to sediment uplift during docking maneuvers. These impacts are expected to occur twice daily during the scheduled arrival of the ferry, for the duration of the construction of the Sardinas Bay Cargo Ramp. Once this construction is complete, the Auxiliary Facility will be kept as an alternate facility to be used only by the PRMTA during emergency situations. The lands surrounding the proposed San Ildefonso Auxiliary Facility belongs to the US Department of the Interior and are on a trust to the DNER for recreational use only. No land development is anticipated.*

1.2. Provide the proposed schedule for the project or activity:

The first step of the proposed schedule is the construction of the passenger ferry dock\mooring dolphin in Sardinas Bay. Simultaneous construction of the Auxiliary Cargo Facility in Ensenada Honda will commence, which is expected to last 7 months. A construction barge will use retrievable spuds to secure itself in position, which will temporarily impacting the sand/mud bottom. Once this Auxiliary Facility is completed, the scheduled cargo ferry service from Fajardo to Culebra will dock at San Ildefonso, while the existing cargo ramp in Sardinas Bay is demolished and rebuilt.

Once the mooring dolphin at Sardinas Bay and the Auxiliary Cargo Facility in Ensenada Honda are completed, the cargo ferry operation will be relocated to San Ildefonso and will continue to operate throughout the construction of the Cargo Ramp at Sardinas Bay. This construction is expected to last an additional 6 months. Total construction time is expected to be one year.

1.3A. Provide a list of adjacent property owners

Sardinas Bay Cargo Ramp:

- **North:** Public Road (Municipality of Culebra)
- **South:** Caribbean Sea (Sonda de Vieques)
- **East:** Municipal Road (Municipality of Culebra) and the the parcel owners listed below:

Catastro	Parcela de procedencia	Dueño	Dirección física	Municipio	Dirección postal
476-022-008-01-000	476-022-008-01	REYES CASANOVA ELIOTT O	1 CALLE PEDRO MARQUEZ	CULEBRA	URB VILLA DORADO ESTAES #913 DORADO PR 00646
476-022-008-02-001	476-022-008-02	REYES CASANOVA ELIOTT O	CALLE PEDRO MARQUEZ	CULEBRA	URB VILLA DORADO ESTAES #913 DORADO PR 00646
476-022-008-03-001	476-022-008-03	LOPEZ CEPERO RODOLFO	3 CALLE PEDRO MARQUEZ	CULEBRA	PO BOX 8966 SAN JUAN PR 00910-0966
476-022-008-04-001	476-022-008-04	MORMAR CORP C/O PETER YATRAKIS	4 CALLE PEDRO MARQUEZ	CULEBRA	52 MARLOW AVE BRICK NJ 08724-7749
476-022-008-05-001	476-022-008-05	MORMAR CORPORATION	6 CALLE PEDRO MARQUEZ	CULEBRA	138 ATLANTIC AVE. BROOKLYN NY 11201
476-022-008-06-000	476-022-008-06	VEGA ROSARIO ANALDY G	78 CALLE PEDRO MARQUEZ	CULEBRA	URB. SANTA ISIDRA III CALLE 3 E-42 FAJARDO PR 00738
476-022-008-07-998	476-022-008-07	CANOVAS TOSTE GABRIEL	CALLE PEDRO MARQUEZ	CULEBRA	PO BOX 183 CULEBRA PR 00775-0183
476-022-008-08-002	476-022-008-08	BANCO CENTRAL Y ECONOMIAS	CALLE PEDRO MARQUEZ	CULEBRA	STE 209 PO BOX 194000 SAN JUAN PR 00919-4000
476-022-008-08-000	476-022-008-08	CANOVAS TOSTE GABRIEL	CALLE PEDRO MARQUEZ	CULEBRA	PO BOX 183 CULEBRA PR 00775-0183
476-022-010-09-000	476-022-010-09	TOMASINI PEREZ MARIO V	LOTE 2 BO PLAYA SARDINAS I	CULEBRA	PO BOX 192393 SAN JUAN PR 00919-2393

- **West:** Caribbean Sea (Sonda de Vieques)

San Ildefonso Auxiliary Cargo Facility:

- **North:** Puerto Rico Department of Natural & Environmental Resources, State Road 250
- **South:** Ensenada Honda
- **East:** Caño Quebrado (Ensenada Honda), Puerto Rico Department of Natural & Environmental Resources and the following list of landowners:

Catastro	Parcela de procedencia	Dueño	Dirección física	Municipio	Dirección postal
473-000-007-10-000	473-000-007-10	PEYA GARCIA COSME	BO FLAMENCO	CULEBRA	PO BOX 187 CULEBRA PR 00775-0187
473-000-007-10-001	473-000-007-10	CARRILLO ORTIZ ZENAIIDA	SEC LAS DELICIAS BO FLAMENCO	CULEBRA	PO BOX 258 CULEBRA PR 00775-0258
473-000-008-01-000	473-000-008-01	NIEVES TORRES HIPOLITA	BO SAN ISIDRO	CULEBRA	APARTADO #53 CULEBRA PR 00775
473-000-008-06-000	473-000-008-06	BONANO CARRERAS SATURNINA	SOLAR 3 BO FLAMENCO	CULEBRA	3455 COUNTRYSIDE BLVD APT 38 CLEARWATER FL 33761
473-095-038-15-000	473-000-009-04	AGOSTO ACOSTA CARMELITA	BO SAN ISIDRO Y BO FRAILE	CULEBRA	PO BOX 718 NAGUABO PR 00718-0718
476-000-001-05-002	476-000-001-05	SANTAELLA VARAS LUIS A	BO SARDINAS	CULEBRA	PO BOX 9023111 SAN JUAN PR 00902-3111
476-000-001-05-003	476-000-001-05	CANTWELL HENT RICHARD	CALLE ESCUDERO	CULEBRA	PO BOX 493 CULEBRA PR 00775
476-000-001-05-004	476-000-001-05	MIRO REYES MIGUEL A.	BO FLAMENCO	CULEBRA	PO BOX 494 VEGA BAJA PR 00694
476-000-001-05-005	476-000-001-05	RODRIGUEZ BOSCH FRANCISCO	BO FLAMENCO	CULEBRA	HC 2 BOX 9496 GUAYNABO PR 00971-9756
476-000-001-05-006	476-000-001-05	APONTE RIVERA ORLANDO	CALLE PUEBLO	CULEBRA	CROWN HILLS PMB 854 138 AVE. WINSTON CHURCHILL CAROLINA PR 00926-6013
476-000-001-05-008	476-000-001-05	MANDELL DONALD	BO FLAMENCO	CULEBRA	36 BROOKSIDE CIR BRONXVILLE NY 10708-5637
476-000-001-05-009	476-000-001-05	ALFREDO A SANTAELLA LATIMER	146 CALLE ESCUDERO	CULEBRA	PO BOX 9023111 SAN JUAN PR 00902-3111
476-000-001-05-010	476-000-001-05	HALKO ANDREW	CALLE PUEBLO	CULEBRA	PO BOX 541 CULEBRA PR 00775-0541
476-000-001-05-011	476-000-001-05	AGOSTO ALVAREZ RAFAEL	BO FLORENCIO	CULEBRA	PO BOX 411 CULEBRA PR 00775-0411
476-000-001-05-012	476-000-001-05	MIDEL G GOMEZ JORGE	150 CALLE ESCUDERO	CULEBRA	PO BOX 365047 SAN JUAN PR 00936-5047
476-000-001-05-013	476-000-001-05	MARTINEZ CLAUDIO JOSE A.	CARR 250 BO FLAMENCO	CULEBRA	PO BOX 438 CULEBRA PR 00775
476-000-001-05-015	476-000-001-05	ROBLES QUI&ONEZ HERMINIO	CALLE ESCUDERO	CULEBRA	PO BOX 2 CULEBRA PR 00775
476-000-001-05-901	476-000-001-05	WILLIAM VOELKER GREGORY	BO FLAMENCO	CULEBRA	PO BOX 751 CULEBRA PR 00775
476-000-001-05-902	476-000-001-05	NAVAS GARCIA MYRNA	BO FLORENCIO	CULEBRA	1383 ALBERT DRIVE MELBOURNE FL 32935
476-000-003-01-003	476-000-003-01	BENITEZ NOYA JOSE LUIS	SOLAR 3 BO FLAMENCO	CULEBRA	PO BOX 191394 SAN JUAN PR 00919-1394
476-000-003-01-004	476-000-003-01	LOPEZ CEPERO RODOLFO	SOLAR 3 BO FLAMENCO	CULEBRA	PO BOX 8966 SAN JUAN PR 00910-0966
476-000-003-01-005	476-000-003-01	CASELLAS MARQUEZ JUAN	BO LA ROMANA	CULEBRA	PASEO LOS CORALES 1616 CALLE MAR DE BARING DORADO PR 00646

- **West:** Ensenada del Cementerio (Ensenada Honda), Puerto Rico Department of Natural & Environmental Resources.

1.4A. Description of the location and dimensions of any adjacent structures

Sardinas Bay Cargo Ramp: *The Sardinas Bay Cargo ramp is located on the Port of Culebra; the nearest structures are the outdoor waiting areas for the passengers boarding the passenger ferry. These structures are mostly plastic roofs held by a stainless steel framework and columns.*

San Ildefonso Auxiliary Cargo Facility: *Auxiliary Cargo Facility is located in the Flamingo Ward, on a peninsula in the northern shoreline of Ensenada Honda Bay. Road 250, borders it to the north to the east by Caño Quebrado, on the west by Ensenada del Cementerio, and on the south by Ensenada Honda. Nearby structures include the existing PRASA Pump house for the desalination plant, measuring 20x11 feet, a 41x15 foot concrete dock with a wooden deck, and a T-shaped terrace, part of the existing facilities. Due to its deteriorated condition, the concrete dock and wooden deck will be replaced with an aluminum dock (with the same footprint as the existing one), while the T-shaped terrace will be modified to better accommodate awaiting passengers.*

See enclosed survey for further details.

1.5. Provide a listing of all other government authorizations obtained or requested for the work, including required certifications relative to water quality.

The project had correspondence with the following government agencies:

List of Government Agencies

Date	From	To	Contact	Position
2014-08-13	AAA	PRPA	Luis R. González Delgado	Tech Manager East Region
2014-10-27	USCG	FTA	R.W. Warren	Captain of the Port
2014-08-15	USCG	PRPA	José Pérez	Lieutenant Commander
2014-07-29	PRNG	PRPA	Edwardo Toro	Mayor
2014-07-02	USFWS	PRPA	Félix López	USFWS Biologist
2015-01-07	USDol	Governor	Susan Silander	Project Leader
2015-04-12	Municipality Culebra	PRPA	Hon. Iván Solís	Mayor

At the moment, the project is in its Environmental Assessment phase, and no authorizations have been received. The Water Quality Certification, awarded by the Environmental Quality Board as a pre-requisite to the USACE permit, will be submitted as soon as there is a notice of intent to issue from USACE.

We have received endorsements from the US Coast Guard, US Department of the Interior and the PR Aqueduct and Sewer Authority, among other local agencies.

1.6 Please provide a statement describing how impacts related to the proposed discharge of fill material in WOTUS are to be avoided and minimized.

The material to be discharged to WOTUS consists exclusively of pilings made of steel and concrete, which will be driven into the seafloor to reach bedrock, as support for the replacement cargo ramp at Sardinas Bay and the Auxiliary Cargo Facility in San Ildefonso. The associated impacts of the discharge of this material to WOTUS are limited to (a) the flora, fauna and habitat impacts upon the seafloor area under the footprint of the pilings, (b) the sediment re-suspension that will result from the pile-driving activity, and (c) the noise and vibration that result from pile-driving/drilling activities.

To mitigate the impacts of the pile-driving activity, the following is proposed:

- 1. Compliance with the National Marine Fisheries Service (NMFS) Sea Turtle and Smalltooth Sawfish Construction Conditions (dated March 23, 2006).*
- 2. Compliance with NMFSs Vessel Strike Avoidance Measures and Reporting for Mariners (revised February 2008).*
- 3. Floating turbidity barriers will be installed prior to commencement of construction activities to prevent suspended sediment transport beyond the work area. These turbidity barriers will also act as an exclusionary barrier for sea turtles and manatees. The turbidity barriers will remain in place and maintained until the authorized works have concluded.*
- 4. A turbidity monitoring plan will be implemented. If turbidity exceeds background levels due to project activities by more than 50 nephelometric turbidity units (NTUs), field staff will temporarily cease activities until turbidity levels return to the baseline level.*

5. *Project vessel operators will be required to avoid dragging of anchors along the marine bottom to avoid significant sediment re-suspension and transport outside the turbidity barriers.*
6. *An Approach and Departure Protocol will be established by the PRMTA for ferries docking in the Auxiliary Facility to minimize sediment uplift during maneuvers.*

A marine observer must be present during active pile driving/drilling and dredging operations to look for sea turtles or manatees that might approach the project area. In the event that the listed species are sighted within a 100 meter radius of the construction activities, these will cease until the listed species moves out of the exclusion zone and has not been sighted for 20 minutes. Observations will be recorded on the daily inspection report and Department of Natural and Environmental Resources will be notified regarding sightings.

1.7A. Statement describing how the impacts to waters of the United States are to be compensated, or explain why compensatory mitigation should not be required for the proposed impacts

Sardinas Bay Cargo Ramp: *Sardinas Bay Cargo Ramp is located within the Culebra Ferry Terminal, which has been in operation for the past century. Impacts during the construction would be temporary and minor, mostly limited to the partial resuspension of sediments due to construction operations. In addition, no Threatened & Endangered species are present in the area and no essential habitat is located under the footprint of the project (seagrass beds). Four of the existing cargo ramp H-piles have coral colonies with a diameter of more than 10 centimeters. These pilings will also be cut and moved to a nearby location, which will be determined in coordination with local personnel from the DNER and the NMFS, and placed in a position that will allow the coral to survive. The placement of the pilings on the bottom substrate will impact approximately 0.0009 acres (41.25 square feet).*

San Ildefonso Auxiliary Facility: *The San Ildefonso Auxiliary Facility is located in an area that has been previously impacted, being the original location of the main settlement in Culebra during the 19th century and eventually the location of Camp Roosevelt in the*

early 20th century. Impacts would be limited to the resuspension of sediments during construction and operation, while a small (an area no larger than 3,426 ft²) will be impacted by shading and by the footprint of the pilings. Threatened & Endangered species may be present in the area (manatees and sea turtles), but no seagrass beds are found within the site, except for a patchy sparse/marginal cover of less than 10% *Halophila decipiens*. Nevertheless, the surface area of the pilings (approximately 707 ft², or 0.017 acres) and the lateral sections below the waterline of the floating pontoon dock (160 ft², or 0.003 acres) should provide substrate for encrusting organisms that are greater than the impacts in the area. Five of the pilings from the existing recreational dock in San Ildefonso have the presence of coral colonies. These pilings will be removed and relocated. Their final location will be determined in coordination with local personnel from the DNER and the NMFS. Potential alternatives to date include leaving the pilings in place, relocating them to an adjacent location directly offshore from their existing location, and placing them in an adjacent location as part of the riprap/concrete slab just east of the existing pier in San Ildefonso.

To compensate for potential impacts associated to sediment uplift during construction and operation of the Auxiliary Facility, the PRPA has proposed the installation of mooring buoys, a Turbidity Monitoring Plan, an Approach and Departure Protocol for the Auxiliary Facility, an Assessment for the Requirement of Additional ATONs, an ESA Listed Coral Survey at the entrance to Ensenada Honda, a Biological Monitoring of Adjacent Seagrass Beds, and a Coral Transplant Plan.

Currently, PRPA is in negotiations with the DNER regarding suitable impact mitigation efforts. PRPA also welcomes any additional input from federal agencies.

The following table is an approximate breakdown of areas available for colonization of these organisms on the pilings and floating pontoon dock that will be installed in Sardinas Bay and in San Ildefonso.

Breakdown of Areas Available for Colonization

Location	Structure	Diameter (inches)	Quantity	Approximate Number of Piles Receiving Sunlight	Total Growth Area	Total Area Available for Encrusting Organisms
Sardinas Bay	Cargo Ramp pilings	20"	25	10	*313.80 ft ²	721.74 ft² (.016 acres)
	Cargo Ramp Catwalk pilings	20"	3	3	*94.14 ft ²	
	Mooring Dolphins (2)	20"	10	10	*313.80 ft ²	
San Ildefonso	Pile Cap & Fender pilings	30"	11	6	518.0 ft ²	1,385.0 ft² (0.032 acres)
	Pontoon Dock pilings	30"	6	6	283.0 ft ²	
	Pile Cap Beam	30"	11	2.5	283.0 ft ²	
	Pile Cap Beam (seawall)	18"	6	0	141.0 ft ²	
	Recreational Dock pilings	18"	8	8	226. 0 ft ²	
	Pontoon Dock (below waterline)	±24"	not applicable	†160 ft ²	160.0 ft ²	
<p>*Assuming that the pile receives enough sunlight to allow adequate growth of encrusting organisms to a depth of 6 feet ** Assuming that the pile receives enough sunlight to allow adequate growth of encrusting organisms to a depth of 3 feet ‡Area/depth below waterline †Area receiving sunlight</p>						

It is worth mentioning that the areas that will be available for encrusting organisms in San Ildefonso will be almost twice of what is currently available.

1.8. Please ensure the information provided as a response to this request for additional information is sufficient to answer items 17 through 25 of the Joint Permit Application, Form (ENG 4354).

2.0. Figures and Exhibits:

(The 13 figures are included as a pdf attachment)

3.0. Additional information not needed for issuance of a public notice that could be addressed at this time and would benefit you by helping us to expedite the review of your application areas follows:

3.1A. Provide a delineation of affected special aquatic sites:

*Both of the proposed projects in Sardinas Bay and San Ildefonso in Ensenada Honda, are located in previously impacted areas. A delineation was not provided due to the fact that the limits of the marine and upland environments are defined by an existing concrete structure. No native vegetation is present in the aforementioned areas; according to the USFWS National Wetlands Inventory Map, both habitats are classified as Estuarine Marine Deepwater Habitats. Nevertheless, a coastal fringe of red mangroves (*Rhizophora mangle*) lies at less than 100 feet east and west of the proposed project location in San Ildefonso. The USFWS National Wetlands Inventory classifies this fringe as an estuarine, intertidal, forested, broad leafed-regularly flooded wetland. This coastal fringe will not be impacted during the construction and operation of the Auxiliary Cargo Facility. The data provided by the USDA/NRCS Soil Maps shows that the soil in Sardinas Bay is classified as "NOTCOM" (not complete) and in San Ildefonso as "water".*

3.2A. Provide the names of federally listed endangered or threatened species that may be affected by the proposed work or utilize designated critical habitat that maybe affected by the proposed work:

Species Listed as Threatened (T) and/or Endangered (E)

	Scientific Name	Common Name	Family	Status
1	<i>Acropora cervicornis</i>	Staghorn Coral	Acroporidae	E
2	<i>Acropora palmata</i>	Elkhorn Coral	Acroporidae	E
3	<i>Caretta caretta*</i>	Loggerhead Sea Turtle	Cheloniidae	T
4	<i>Chelonia mydas*</i>	Green Sea Turtle	Cheloniidae	T, CH
5	<i>Dendrogyra cylindrus</i>	Pillar Coral	Meandrinidae	T
6	<i>Dermochelys coriacea*</i>	Leatherback Sea Turtle	Dermochelyidae	E, CH
7	<i>Epicrates monensis granti</i>	Virgin Islands Boa	Boidae	E
8	<i>Eretmochelys imbricata*</i>	Hawksbill Sea Turtle	Cheloniidae	E, CH
9	<i>Mycetophyllia ferox</i>	Rough Cactus Coral	Mussidae	T
10	<i>Orbicella annularis</i>	Lobed Star Coral	Merulinidae	T
11	<i>Orbicella faveolata</i>	Mountainous Star Coral	Merulinidae	T
12	<i>Orbicella franksi</i>	Boulder Star Coral	Merulinidae	T
13	<i>Pelecanus occidentalis*</i>	Brown Pelican	Pelecanidae	E
14	<i>Sterna dougallii*</i>	Roseate Tern	Sternidae	T
15	<i>Sternula antillarum</i>	Least Tern	Sternidae	E
16	<i>Trichechus manatus manatus*</i>	West Indian Manatee	Trichechidae	E

*Listed under state regulations

CH: Species with Designated Critical Habitat

3.4A. Provide any information in reference to the presence or absence of submerged aquatic vegetation or resources, which could be adversely affected by this project:

Sardinas Bay: *The aquatic habitats at the area selected for the proposed action at Sardinas bay has been impacted for years by the construction and operation of the existing ferry terminal. The benthic substrate immediately adjacent to the cargo ramp and to the seawall consists mainly of a mix of rock rubble intermixed with small amounts of sand. With the exception of very small colonies of encrusting Siderastrea radians observed on the rock rubble and a single colony on the substrate, no corals were observed on the substrate adjacent to the cargo ramp and seawall.*

Moving away from the cargo ramp, the substrate transitioned to sandy habitat where seagrasses are present. Seagrass beds were observed northwest/west and southwest of the existing cargo ramp structure. The seagrass bed located northwest/west was dominated by Syringodium filiforme (manatee grass) mixed with Thalassia testudinum (turtle grass) and Halophila decipiens (paddle grass). The seagrass bed located southwest was comprised of S. filiforme. The seagrass bed to the northwest is dense Syringodium filiforme (50-100%) and the edges of the bed are mainly Halophila decipiens and not as dense (25-50%). The area to the south is much less dense Syringodium sp. in deeper water (5-25%).

The cargo ramp support piles and the seawall were encrusted with a diverse invertebrate community comprised of varied organisms, including corals, sponges, tunicates, macro algae, crustose coralline algae, bryozoans, worms, snails, urchins, etc. A total of twelve coral colonies (>10 cm in diameter) were documented during the coral survey, which may be impacted by the construction. These colonies included the following species of coral: Diploria strigosa, Diploria clivosa, Diploria labyrinthiformis, Colpophyllia natans, Meandrina meandrites, Eusmilia fastigiata, Porites astreoides, Porites porites, and Agaricia sp. None of these are listed as threatened or endangered.

In summary, the following aquatic (marine) habitats are present at the project site in Sardina Bay: Colonized Artificial Hardbottom, Rubble, Sand, Seagrass (continuous >90%

coverage), Seagrass (discontinuous 70≤90%), Seagrass (patchy ≤50%), Seagrass (marginal <10%), and pelagic.

San Ildefonso: *The proposed construction of the Auxiliary Cargo Facility is located in an area of Ensenada Honda that has been previously impacted by the construction and operation of the existing seawall and dock. The Auxiliary Facility area is primarily composed of soft, sandy/muddy substrate colonized by various species of macroalgae and sessile and mobile macro-invertebrate taxa, including sponges, solitary and colonial tunicates, sea stars, polychaete worms, snails, and crustaceans. The soft-bottom (mud/sand) habitat is the most common within Ensenada Honda. Light availability is limited, with photosynthetic organisms such as seagrasses and zooxanthellate corals are unlikely to be found mainly below 15 feet msl.*

*The benthic substrate immediately adjacent to the seawall structure west of the existing pier (within the impact area) consisted mainly of a mix of rip-rap (rock rubble) intermixed with small amounts of sand, which were colonized by patches no wider than 3 feet, 1 to 10 feet long of turtle grass (*Thalassia testudinum*). With the exception of a few very small colonies of encrusting *Siderastrea radians* observed on the rock rubble, no corals were documented on the substrate adjacent to the seawall.*

*East of the existing pier outside of the impact area, a concrete slab that was originally part of the pier, lies 3 to 4 feet of water and less than 30 feet from the seawall. This slab has a dense macroalgal growth composed mostly of *Dictyota* sp and small colonies of *Siderastrea radians* adhered to its edges. A dense growth of *Thalassia testudinum* was documented growing at a distance of up to 13 feet from the seawall.*

*The existing pier support piles were encrusted with macroalgae, crustose coralline algae, mollusks, sponges, tunicates, bryozoans, and polychaete worms. Moving away from the seawall, the substrate generally transitioned to muddy/ sandy habitat where various species of macroalgae, mostly a mix of *Dictyota* spp., *Halimeda* spp., and *Caulerpa prolifera* are present.*

Live- and hard-bottom habitat in the project area is limited and almost exclusively uncolonized mud/sand substrate, although there is a significant sparse macroalgae cover. Besides the rock rubble, seawall, and the dock pilings, there is little to no structural complexity in the area that would provide suitable habitat for juvenile and adult reef fishes

*or spiny lobster. The poor light penetration (<23') and limited hard substrate makes this area ill-suited for coral settlement and growth. Coral diversity and abundance was higher in areas east of the existing dock, where the concrete slab and its remaining pilings have created additional hard substrate for them, and on the pilings facing the east and south sides of the dock. Five pilings had encrusting of coral colonies with a diameter greater than 10 cm, for a total of 12 colonies from 6 species. Most of these colonies had encrusting organisms of their own (sponge growth, tube worms) or had sections covered in detritus. A total of six coral species were identified on the pilings: Symmetrical Brain Coral (*Diploria strigosa*), Star Coral (*Madracis pharensis*), Great Star Coral (*Montastraea cavernosa*), Mustard Hill Coral (*Porites astreoides*), Lesser Starlet Coral (*Siderastrea radians*), and Massive Starlet Coral (*Siderastrea siderea*). The largest coral colony identified belonged to *Madracis pharensis*, which was attached near the base of piling near the seawall in approximately 3 feet of water.*

*Various individual coral colonies, such as those belonging to *Siderastrea*, *Diploria* and *Madracis* families were identified on the area east of the existing dock which were not found west of the dock, where the auxiliary terminal will be located. No endangered species of coral, including those recently listed, and no seagrass habitats were observed within the study area.*

In summary, the following aquatic (lagoon) habitats are present at the project site in San Ildefonso: Colonized Artificial Hardbottom, Rubble, Mud/Sand, Seagrass (continuous >90% coverage), Seagrass (marginal <10%), Macroalgae (continuous >90%), Macroalgae (discontinuous 50≤90%), Macroalgae (sparse 10≤50%) and pelagic.

3.5A. Provide a description of vegetation cover types and/or land uses on the subject property:

Sardinas Bay Cargo Ramp: *Vegetation cover is limited to planted ornamentals; the area has been previously developed into the Culebra Ferry Terminal. This existing vegetation will not be impacted by the proposed project. According to the Puerto Rico Planning Board, the land use classification for the site is “Comercial Turístico Intermedio”*

San Ildefonso Auxiliary Cargo Facility: *Vegetation cover is limited to planted ornamentals; the area has been under development since the early 1900s. A total of 28*

trees belonging to 5 families and 8 species were assessed within the proposed project boundaries. From this total, 1 species was classified as native and 7 as introduced. According to the Puerto Rico Planning Board, the land use classification for the site is “Conservación de Recursos”

3.6A. Provide a discussion of existing site features, hydrologic conditions, and overall wetland conditions, which help define the overall hydrological regime of the project site:

Sardinas Bay Cargo Ramp:

- **Wetlands:** *According to the USFWS National Wetlands Inventory Maps, the area within Sardinas Bay is classified as a marine system with a continuously submerged substrate and an unconsolidated bottom. This location has been previously impacted by the development of the existing facilities. No wetlands are present within the Cargo Ramp location. The reconstruction of the Cargo Ramp will not impact or affect protected wetland areas.*
- **Soils:** *According to the U.S. Department of Agriculture Soil Conservation Service (USDA/NRCS) Soil Survey of the Humacao Area of Eastern Puerto Rico, and the USDA/NRCS Web Soil Survey, the Sardinas Bay area contains 3 soil type series. The identified soil series near the Project area are: **Descalabrado clay loam (DeE2) with 20-40% slopes, eroded, Water (W)** and areas where **No Digital Data is Available (NOTCOM)**.*

San Ildefonso Auxiliary Cargo Facility:

- **Wetlands:** *No wetlands are present within the location of the proposed Auxiliary Cargo Facility in San Ildefonso, as the area has been previously impacted by the development of the existing facilities. Nevertheless, a coastal fringe of red mangroves (*Rhizophora mangle*) lies at less than 100 feet east and west of the location. According to the USFWS National Wetlands Inventory, this fringe is classified as an estuarine, intertidal, forested, broad leafed-regularly flooded wetland. This coastal fringe will not be impacted during the construction and operation of the Auxiliary Cargo Facility.*

- **Soils:** *The area near the Auxiliary Cargo Facility in San Ildefonso site contains 3 soil series: **Rock land (Rs)**, **Water (W)** and **Tidal Swamp (TS)**. No major impacts to soils are expected during the operation of the Auxiliary Cargo Ferry Facility. The proposed location lies in an area previously impacted by the existing facilities, and has been under development since the beginning of the past century.*

3.8.aA: Provide a discussion of alternative sites and why this particular site was selected for your project:

An Alternative Analysis was conducted to evaluate the options available for minimizing impacts associated with the reconstruction of the existing Cargo Ramp in Sardinas Bay and for an alternate cargo terminal to be used during its reconstruction, in order to maintain the existing scheduled of passenger and cargo operation. Various alternative configurations were considered and will be discussed as follows:

- **No Action Alternative:** *The No Action Alternative would not change the existing cargo ramp conditions. This alternative would neither produce environmental impacts, nor would it meet the safety needs required for the existing Culebra Ferry Terminal Facilities. Due to its structural deficiencies, the partial or complete collapse of the deck or its sections is imminent in the near future if repairs are not conducted in a timely manner. The No Action Alternative could also be described for not building of an auxiliary facility. This alternative is not a viable option if the Cargo Ramp will be re-constructed, mostly due to logistic, operational and safety concerns. The Culebra Ferry Terminal Facilities, which measure approximately 166 feet, do not have the room to allow the passenger ferry to dock while the construction/demolition barge and the turbidity barrier are anchored in place. Currently, the cargo and passenger ferries cannot dock simultaneously.*
- **Proposed Action:** *Reconstruction of the existing pier at Sardinas Bay. See Section 1.1A for details.*
- **Other Action Alternatives:** *The existing Fulladosa Dock (**Latitude 18°18'3.79" N** and **Longitude 65°17'27.78" W**) is located within Ensenada Honda Bay in Culebra was considered as a site for the Auxiliary Cargo Facility. To reach the Fulladosa Dock by sea, the cargo ferry would follow the same route as that to reach San Ildefonso, except that Fulladosa is located on the western shoreline of Ensenada Honda, rather than its eastern one. In the past, the Fulladosa Dock had been used by the PRMTA for its cargo ferries,*

which were much smaller than the current fleet. The newer cargo ferries require a width of at least 40 feet for a safe docking and operation of the cargo door/ramp. With the actual width of the dock platform being 10 feet, the existing facilities would need extensive structural modifications.

The Fulladosa dock is located at the edge of a narrow (approximately 5 meters wide) two-way road with no shoulders or median. Required cargo terminal facilities include a passenger terminal waiting area, ticket booth, and parking to serve the 24 vehicles uploading to the ferry, taxi waiting areas, plus passenger drop-off and collection. In addition, adequate space is required for the additional 24 vehicles that would be arriving in the ferries. Terminal upland facilities will, thus, require cutting approximately 1.0 acre of the steep (30+ degree slope) land on the opposite side of the road; alternatively, the required facilities could be filled or constructed over pilings within the open waters of Ensenada Honda. The latter would be the safest option, so that the waiting area in the terminal and its associated facilities are on the same side of the road as the ferry. However, from an environmental perspective, it is the least acceptable option. The filling of open waters or the construction of pilings is much more expensive, in addition to the costs associated to the cutting and impacting of uplands.

During its operation, traffic in the area would be severely impacted, as the road lacks the minimum width required by the Puerto Rico Department of Transportation and Public Works (DTPW) for such operation. To upgrade the existing roadway, it would require widened for a length of approximately 1,100 meters to a minimum width of 7.4 meters per current design standards¹. The appropriate stormwater infrastructure and light poles would have to be installed, and the slopes cut along the road would have to be stabilized from the proposed facility until reaching the town of Dewey. The PREPA and PRASA infrastructure would have to be relocated, which would leave the residents of the Playa Sardinas II ward in the southeastern section of the island with an interrupted service during relocation works. In addition, the US Coast Guard has stated that road traffic would have to be stopped during ferry operations.

- **Alternatives Considered and Dismissed.**

Phased Reconstruction would consist of demolishing half of the Cargo Ramp platform, removing the pilings that supported it, replacing those pilings, and rebuilding the platform, while using the other half for continued cargo operations. Once the first half of the Cargo Ramp was completed, the procedure would be repeated for the second half of the Cargo Ramp. A detailed analysis concluded that the alternative of a phased reconstruction at the Sardinas Bay Terminal Facility is not a practical option, mostly due to logistics and operational concerns. The Sardinas Bay Terminal Facility does not have the adequate dimensions to allow the passenger ferry to dock while the demolition barge and turbidity barrier are set in place. The larger passenger ferries (over 150 feet LOA) on the MTAPR fleet that make the scheduled trip from Fajardo to Culebra would not be able to dock if the demolition/construction barge is in place. The Sardinas Bay Terminal Facility is approximately 166 feet long; due to this constraint, the cargo and passenger ferries cannot presently be docked simultaneously. To allow for such operation, the demolition barge and the turbidity barrier would have to be removed from the area before the ferries are scheduled to arrive, and reattached once they leave the terminal, which happens several times per day. The impact upon seafloor would be from the retractable spuds that would impact larger areas of the seafloor. The associated time delays would add significantly to the budget and the associated disruption in the scheduled ferry services, and the time required would impact the construction duration excessively. This is therefore and impractical option during the reconstruction of the Cargo Ramp.

Restoration of Existing Piles: In order to minimize impacts of the existing Cargo Ramp reconstruction, several options were considered prior to concluding that a complete replacement is the most viable option with minimal impact. One of the options considered was to restore the existing Cargo Ramp pilings. One of the benefits of restoring the damaged portion of the H-pilings is that any existing coral and other encrusting organisms would not be disturbed. This option consisted of cutting the damaged portion of the H-pilings and restoring it with a new H-piling section using a load bearing repair. Optional to this methodology was to add structural capacity by slipping a cylindrical mold over the H-piling and filling it with concrete. The option of restoring the pilings was considered but dismissed mainly due to safety concerns, as the existing pilings are in an advanced state

of corrosion. If the pilings were to be restored, they would eventually need replacement due to their shortened useful lifespan. Adding the concrete encasing could mitigate these concerns, but would still destroy encrusting organisms. Questions remained about the structural integrity of the existing pilings below the mudline even after concrete encasing. Another concern with this option was the significant increase in construction time and associated increase in construction costs. Repairing the pilings would increase the construction length of time by approximately three months, since the repairs would be customized to the condition of each piling. Three months of additional construction time would add significantly to the budget and the associated disruption in the scheduled ferry services. Further, the marine biological study conducted at the site concluded that no endangered species are present in the pilings, and therefore, no significant adverse impact was involved in the removal of the existing pilings.

Replace Pilings Leaving Existing Pilings in Place: *In order to protect existing encrusting organisms presently attached to the pilings, this option considered cutting the pilings at the water line and driving the replacement pilings next to the existing ones. This option is not feasible due to the limited space that would be available between the existing pilings and those proposed to be installed. There is also a high probability of damaging the structures and the encrusting marine organisms during the installation of the new pilings due to the limited space for construction. Additionally, the structural design would place some replacement pilings right against existing pilings, making for very difficult constructability. The absence of endangered species on the pilings, according to the biological survey conducted, removed this option as impractical.*

It is worth mentioning that all operations within Sardinas Bay would be taking place within the boundaries of the Port of Culebra in previously impacted locations. In San Ildefonso, the area proposed for the floating pontoon dock was originally the location of the dock used by the US Navy during their occupation of Culebra. Nowadays, it is generally used by recreational fishermen and for launching personal watercraft.

ⁱ PRDOT&PW (1979) [Puerto Rico Highway and Transportation Authority Design Manual](#). Commonwealth of Puerto Rico Department of Transportation and Public Works, Highway Authority. Table 1-13.



AUTORIDAD DE CONSERVACION Y DESARROLLO DE CULEBRA

28 de julio de 2015

Francisco Pérez Aguiló, M.S., REM
Senior Project Manager, Atkins Caribe
Metro Office Park 8 Suite 102
Guaynabo, P.R. 00968-1705

Estimado señor Pérez:

Como es de conocimiento general, la Autoridad de Puertos de Puerto Rico (PREPA) se dispone a reconstruir la plataforma de Carga del Terminal de Lanchas de Carga de Culebra, localizada en Dewey, Culebra, Puerto Rico. Esta es la entrada principal de la isla de Culebra, por lo que se requiere la construcción de una facilidad alternativa a ser utilizada para continuar las operaciones de carga mientras perdure el proyecto de reconstrucción.

El lugar seleccionado para sustituir las facilidades de plataforma de carga mientras se lleva a cabo la reconstrucción de Bahía Sardinas, es el Sector de San Ildefonso, según se desprende de su comunicado. En el sector de San Ildefonso se encuentran las facilidades de varias agencias, a saber: la Autoridad de Conservación y Desarrollo de Culebra (ACDEC), el Servicio de Pesca y Vida Silvestre, el Refugio de Vida Silvestre, el Cuerpo de Vigilantes de la Guardia Nacional, el Cuerpo de Vigilantes del Departamento de Recursos Naturales y Ambientales y Oficinas Locales de la Autoridad de Acueductos y Alcantarillados y de la Autoridad de Energía Eléctrica. Tomando en consideración el alto flujo de vehículos y personal en el área por la congestión de agencias que ubican allí, es la posición de la ACDEC que se debe construir un estacionamiento provisional para proveer espacio a los empleados de dichas agencias y demás público que ahora llegará a la isla por esta área. Por otra parte, la ACDEC recalca que el muelle utilizado por las lanchas del Servicio de Pesca y Vida Silvestre y por el Departamento de Recursos Naturales y Ambientales no debe ser removido sin proveer facilidades alternativas puesto que es el único muelle a utilizar en un caso de una emergencia y rescate.

La ACDEC no tiene objeción a la construcción de las facilidades alternativas en el Sector de San Ildefonso siempre y cuando se respete lo anteriormente señalado. Entendemos que el sector propuesto para las facilidades alternativas surge de la investigación exhaustiva de varias alternativas. Más aun, destacamos que se entiende dicha construcción debe estar en cumplimiento con todas las disposiciones ambientales y que toda medida de control y construcción tomada debe estar acorde con los planos y diseños sometidos y aprobados para el proyecto.

Respetuosamente,

María Coral Sánchez Parrilla
Directora Ejecutiva
Autoridad de Conservación y
Desarrollo de Culebra



JUN 18 2015

Gabriel Hernández - Atkins Caribe, LLP
Metro Office Park
Lote 8 Calle 1, Suite 102
Guaynabo, Puerto Rico 00968

Estimado señor Hernández:

Autoridad de los Puertos de Puerto Rico
Terminal Ferry Culebra
Reconstrucción y Reparación de Rampa
Playa Sardinias, Culebra
O-BD-CZM01-SJ-00530-17112014
Solicitud Conjunta Núm. 1397

Luego de evaluar el documento de mitigación suministrado como parte de su Solicitud de Concesión, tenemos los siguientes comentarios y/o requerimientos que deberán ser atendidos para continuar con la evaluación de su caso:

- ans*
1. El documento no considera el impacto que tendrá la operación del ferry sobre las tortugas y manatíes debido al ruido, la turbidez y la contaminación por aceites, pintura y otros químicos asociados a la operación de la embarcación y sus motores. Al esto no ser atendido, tendría como consecuencia el desplazamiento de las especies de su hábitat.
 2. El proyecto habla sobre la ampliación de la carretera de acceso al ferry, pero no hemos recibido información sobre las medidas que se implementarían para minimizar el impacto de la erosión y sedimentación que tendrá esta actividad. Tampoco se incluye en el plan de mitigación.
 3. Existen unas colonias de corales que deben ser relocalizadas ya que están dentro de la huella de impacto del proyecto. Dicha actividad es parte del plan de mitigación, pero el documento suministrado no la incluye.
 4. El plan de mitigación propone colocar 4 boyas y darle mantenimiento por 5 años. El tiempo correcto de mantenimiento deberá ser mientras el terminal esté en operación, no sólo por el tiempo de construcción y operación del terminal auxiliar.



JUN 18 2015

Carta Información Adicional
Reconstrucción Terminal Ferry Culebra
O-BD-CZM01-SJ-00530-17112014
Playa Salinas, Culebra
Página 2 de 2

Para facilitar la evaluación de los documentos requeridos, los mismos deberán ser referidos a la Oficina de Secretaría de nuestro Departamento. Para cualquier información sobre su caso, deberá comunicarse directamente con la Sra. Ana R. Barea Rechani, Directora del Negociado de Permisos, al (787) 999-2200, extensión 2851 o 2815.

Cordialmente,



Nelson Velázquez Reyes

Secretario Auxiliar

Secretaría Auxiliar de Permisos, Endosos y Servicios Especializados

JCD/ARBR/jcd

Perez, Francisco

From: Perez, Francisco
Sent: Wednesday, June 17, 2015 12:01 PM
To: José A. Rivera (Email)
Cc: Milagros Rodríguez Castro (Email); José Ayala (Email)
Subject: RE: Improvements to the Culebra Cargo Ferry Ramp, Bahía de Sardinias, Culebra. (FEMA: HGMP FEMA-DR4017-PR) (USACE: SAJ-2002-01425 (SP-JMS))

Dear Mr. Rivera,

Thank you very much for your call this morning with your preliminary comments concerning Habitat Conservation and the proposed action. In summary, you conveyed that the project appears well planned and designed, and that the poster to disseminate the project to the community was very well presented and informative. You also conveyed the following impressions:

1. That the floating platform should be extended as far offshore as possible, to minimize sediment re-suspension during ferry operation.
2. That a protocol is developed for the approach and take-off from San Ildefonso in order to minimize sediment re-suspension, and to develop awareness among the ferry captains of the impact of sediment re-suspension.
3. To minimize the adverse effect of shading, that the project use surfaces that allow light transmission to the water (grating of some sort) for the floating platform and other surfaces.

You also mentioned that the public notice issued by the USACE will trigger the formal comments from NMFS Habitat Conservation.

Again, thank you very much for your preliminary comments. We will notify you of the location for the June 25 meeting once that is set.

Cordially,

Francisco Pérez Aguiló, M.S., REM
Senior Project Manager, Atkins Caribe

ATKINS

Thought leadership in a complex world – www.atkinsglobal.com/angles

Metro Office Park 8 Suite 102, Guaynabo, Puerto Rico 00968-1705
Tel: +1 (787) 294 2010 X-430-1225 | Fax: +1 (787) 294 2002 | Cell: +1 (787) 439-5768
Email: francisco.perez@atkinsglobal.com | Web: www.atkinsglobal.com/northamerica | Careers: www.atkinsglobal.com

From: Perez, Francisco
Sent: Friday, June 12, 2015 3:27 PM
To: José A. Rivera (Email)
Cc: Milagros Rodríguez Castro (Email); José Ayala (Email)
Subject: Improvements to the Culebra Cargo Ferry Ramp, Bahía de Sardinias, Culebra. (FEMA: HGMP FEMA-DR4017-PR) (USACE: SAJ-2002-01425 (SP-JMS))

Dear Mr. Rivera:

The Puerto Rico Ports Authority (PRPA) requests your comments regarding Habitat Conservation for the subject project. Following is a link for you to access the preliminary environmental assessment (P-EA) prepared for the proposed action along with its technical appendices. In addition, the ESA Section 7 Consultation biological assessment was enclosed in that bundle, for your information.

Secure File Downloads: Available until: **17 June 2015** Click link to download: [EA Plus Appendices.zip](#) 58,046.68 KB

In summary, the Culebra Ferry Terminal cargo ramp at Bahía Sardinias has deteriorated to the point that it is no longer economically feasible to repair it. It is the only cargo ferry access to the Island, and as such it is important to replace it expeditiously. The physical facilities at the Terminal make it impossible to simultaneously rebuild the cargo ramp and continue cargo operations. Also, Sardinias Bay frequently faces weather conditions that make it impossible for the cargo ferries to make port there. For these reasons, the proposed action also includes the construction of an Auxiliary Terminal for Culebra. After evaluating the alternatives for siting the Auxiliary Terminal, the San Ildefonso area was selected. The Fulladosa Pier was the other potential site.

Marine habitats to be impacted by the proposed action have been surveyed. No listed species of coral were observed in the pilings to be removed at Sardinias, where the project's footprint is essentially as it presently is. The benthic habitats at San Ildefonso consist of soft sediments not covered by seagrass beds; under the project's footprint and at the ferry berthing area the only seagrasses found were patches of *Halophila decipiens* at less than 10% coverage per patch (see enclosed habitat map from the EA). Adjacent to the project's footprint there are seagrass beds.

The P-EA illustrates conceptually the proposed action and defines the foreseeable impacts and the PRPA commitments. The PRPA has met with agency representatives and has addressed additional concerns, including sediment re-suspension impacts from the operation. The following relevant commitments have been made by the PRPA for the proposed action since the P-EA was distributed:

1. To mitigate for sediment re-suspension impacts that may be caused by the ferry operation at San Ildefonso, the PRPA proposes the installation of 4 mooring buoys in the Almodóvar area (Las Pelás), as agreed with the USF&WS and the DNER. These buoys will protect approximately 8 acres of existing seagrass beds, a 50 meter radius each, to compensate for the potential impacts to the approximately 0.85 acres of *Thalassia testudinum*, adjacent to the ferry's berthing area.
2. The floating terminal has been extended so that the ferry's berthing area is 17 feet deep or more, to reduce the sediment re-suspension potential.

The PRPA has installed 6' x 8' informational banners in English and in Spanish (enclosed) at the Culebra Ferry Terminal that summarize the proposed action, has provided the Culebra Community Library and the Culebra City Hall with a copy of the P-EA, and has established a

mailing and an electronic address (culebrapier@APPR.pr.gov) so that the public may participate of the process.

We hope that this information is adequate for your Habitat Conservation evaluation. I am available to answer any questions that you may have. My phone numbers are below. You may also contact Milagros Rodríguez, PRPA's Environmental Manager (copied here) or at (787) 729-8715 x 3229.

Cordially,

Francisco Pérez Aguiló, M.S., REM
Senior Project Manager, Atkins Caribe

ATKINS

Thought leadership in a complex world – www.atkinsglobal.com/angles

Metro Office Park 8 Suite 102, Guaynabo, Puerto Rico 00968-1705

Tel: +1 (787) 294 2010 X-430-1225 | Fax: +1 (787) 294 2002 | Cell: +1 (787) 439-5768

Email: francisco.perez@atkinsglobal.com | Web: www.atkinsglobal.com/northamerica | Careers: www.atkinsglobal.com

ESTADO LIBRE ASOCIADO DE PUERTO RICO



60 ANIVERSARIO
INSTITUTO de CULTURA
PUERTORRIQUEÑA

787-723-2524
PO BOX 9024184
SAN JUAN DE PUERTO RICO 00902-4184

15 de junio de 2015

AUTORIZACIÓN CONDICIONADA

Adelís Cabán Acevedo
Atkins Global
Metro Office Park 8
Calle 1, Suite 102
Guaynabo, Puerto Rico 00968-1719

*MUELLE AUXILIAR DE SAN IDELFONSO PARA TERMINAL DEL FERRY
ENSENADA HONDA, BAHÍA SARDINA, CULEBRA
CZ-2015-1120-050*

Estimada señora Cabán:

El **Programa de Arqueología y Etnohistoria** del Instituto de Cultura Puertorriqueña ha evaluado el Estudio Arqueológico Fase IA-IB terrestre y subacuático, realizados por los arqueólogos Adalberto Maurás y Richard Fontánez, respectivamente.

La evaluación fue realizada conforme a las disposiciones de la Sección 10 de la Ley 112 del 20 de julio de 1988, conocida como la Ley de Arqueología Terrestre de Puerto Rico y las disposiciones de la Ley 10 del 7 de agosto de 1987, conocida como Ley de Arqueología Subacuática.

Según la investigación presentada, en el área terrestre se encontró infraestructura soterrada que impidió realizar la prospección arqueológica eficientemente, por lo que tenemos poca información sobre los recursos culturales que pudieran existir bajo el terreno, pero se entiende que el área es arqueológicamente sensitiva. Por lo tanto, se autoriza el comienzo de los trabajos condicionado a un **monitoreo arqueológico** terrestre durante los trabajos de excavación y remoción de corteza **terrestre**.

En el estudio arqueológico subacuático se localizaron restos sumergidos de un antiguo muelle y 200 pies hacia el este, fuera del área de estudio, existen los restos de una embarcación. Por tanto, se deberá llevar a cabo un **monitoreo arqueológico subacuático** durante la instalación de pilotes o en el caso que se planifiquen operaciones de dragado, actividades que modifiquen la actual línea costera y el tabla estacado, o que requieran la remoción del muelle sumergido.

Además se deberá establecer una zona de amortiguamiento de por lo menos 100 pies entre el área de construcción del muelle y la embarcación antigua sumergida. Se recomiendan estudios adicionales de Fase IB, en caso de designar un área de maniobras, lo cual no se consideró en los límites de la evaluación realizada.

CONDICIONES PARA EL MONITOREO ARQUEOLÓGICO

1. Se informará al Programa de Arqueología y Etnohistoria de la fecha de comienzo de los trabajos y el nombre del arqueólogo o arqueólogos contratados.
2. Se contará en todo momento con la presencia de un arqueólogo terrestre y subacuático cualificado, según el caso. El arqueólogo o arqueólogos contratados deben estar cualificados por el Consejo de Arqueología Terrestre y Subacuática para realizar evaluaciones arqueológicas a nivel Fase II.
3. En caso de detectarse algún depósito, estructura, material o vestigio de carácter arqueológico, se deberán detener los trabajos inmediatamente. El arqueólogo procederá con la documentación de los hallazgos. De entender que el hallazgo tiene unas características que ameriten consideraciones adicionales, deberá notificarse al Programa de Arqueología para que realice su evaluación. Esta notificación debe ser presentada junto con las recomendaciones del arqueólogo.
4. Una vez concluidos los trabajos, deberá entregar un **INFORME FINAL**, que incluya todos los trabajos monitoreados, hallazgos realizados, elementos documentados, materiales arqueológicos recuperados, la información histórica de contexto, entre otros.

Se le apercibe que el incumplimiento de cualquiera de los requerimientos establecidos en la presente carta, podrá ser objeto de sanciones administrativas según lo establecido en las citada leyes.

Esta autorización tiene **vigencia de un (1) año**.

Cordialmente,



Arqla. Laura Del Olmo Frese
Directora
Programa de Arqueología y Etnohistoria



June 11, 2015

Ana M. Román
Deputy Project Leader
Caribbean Islands National Wildlife Refuge and
Culebra National Wildlife Refuge Manager
United States Department of the Interior
Fish and Wildlife Service
Caribbean Islands National Wildlife Refuge
P.O. Box 510
Boquerón, Puerto Rico 00622

**Subject: Your letter of May 7, 2015 and our meeting on June 1, 2015
Rehabilitation of Culebra Cargo Pier, Culebra, Puerto Rico**

Dear Ms. Román:

The Puerto Rico Ports Authority (PRPA) thanks you for the subject letter with comments regarding the proposed action, and for taking the time to meet with our representatives at your Boquerón office. We sincerely regret the oversight of not including the Culebra National Wildlife Refuge (CNWR) in the original dissemination of the proposed action's Environmental Assessment (EA), and acknowledge that the Culebra Refuge headquarters and other facilities are located in close proximity to the project site. This project is seeking federal funding, and has entered the NEPA process. Your input is very important to us. Enclosed please find a CD that includes the proposed action's EA and its technical appendices. Below we summarized the issues that concerned you, as gathered from your letter and from our meeting, and also the solutions we propose to redress your concerns.

1. Clarifications.

- a. - The proposed action will not include a ramp. The proposed action's footprint will not encroach upon either of the two existing boat ramps.
- b. - The drawing previously showed a gate blocking access to the waterfront area during construction. That gate will no longer appear in the project drawings nor will it be used.

2. The 1982 Quit Claim Deed (QCD) and 1991 Cooperative Agreement allow only recreational uses for the lands released and quitclaimed. Also, concerns for uses other than the cargo ferries.

The PRPA has consulted with the Department of Interior (DOI) on the subject, and in its January 5, 2015 letter stated it had no objection to the proposed action. As a result, the PRPA is drafting amendments to the QCD for the DOI's perusal and execution. Such amendment take into consideration the results of our June 1, 2015 meeting and subsequent communications with the Culebra Conservation and Development Authority. Please, review the following draft language:

“The grantor and the grantee agree that the grantee will be allowed to construct and operate a ferry pier in a portion of land of approximately 0.79 acres and 0.34 acres of right of way of the total parcel area, located in tract 1k as described in the Quitclaim Deed, which comprise 109.48 of the 935.98 acres. The use of the San Ildefonso pier will be limited to the period of reconstruction works at Sardinas Bay Terminal, and afterwards to remain as a spare facility for the ferries during emergencies, in the event that the Sardinas' ferry terminal becomes damaged or inoperable, including but not limited, to an Act of God, and in the event that the Sardinas' terminal capacity is exceeded by demand. Use of the Auxiliary Terminal beyond the period of reconstruction of the Sardinas terminal will be determined by the Director of the Puerto Rico Maritime Transport Authority”.

3. Access to the boat ramp and pier facilities during the construction and operation periods.

a. Construction Period.

During the estimated six month construction period at San Ildefonso, certain pavement and parking areas will undergo excavations and other activities which, on occasion, will hinder free access. Please refer to the proposed action's footprint on Figure 5 of the EA, page 23. During this period, access must be coordinated with the construction contractor in order to protect the users' health, safety and wellbeing. A meeting with all parties will be coordinated initially to provide maximum access to the Culebra Conservation and Development Authority (CCDA), the Culebra municipal employees, the Culebra Wildlife Refuge, the Fish and Wildlife Service, the PR National Guard, the PR Department of Natural and Environmental Resources (DNER), the PR DNER Vigilantes, and the PR Water and Sewer Authority. The construction contract will specify these access requirements and the meeting with stakeholders.

b. Operation Period.

After construction is completed, conditions will approximate existing conditions. Operation of the ferry at San Ildefonso will not obstruct use of the boat ramps. The four parking spaces previously labeled “Staging Parking”, located along the wall facing the waterfront, will now be labeled “For Official Vehicles Only”.

4. Advanced approval from the Culebra Conservation and Development Authority.

On May 29, 2015 the PRPA has submitted a package of information to the CCDA in consideration to the QCD's Section III.B.2. We have received preliminary feedback from the Mayor of Culebra, who sits on the CCDA's Board of Directors, and he anticipated that a letter with their formal input will be provided within the week.

The PRPA proposes to address the issues raised in the above-indicated manner, which will be reflected in the Final EA. Should you agree with these proposed resolutions, your acknowledgement for the record would be appreciated. Should you have additional comments, please contact Francisco Pérez Aguiló at (787) 439-5768 or Milagros Rodríguez Castro at (787) 729-8715 x3229 for expediency.

Cordially,

Jorge Suárez Pérez-Guerra
Auxiliary Executive Director
Planning, Engineering and Construction

Enclosures: - CD of the proposed action's EA and its technical appendices.
January 5, 2015 letter from the USDI

cc: - USCOE, Regulatory Section, San Juan
PRDNER, San-Juan
CCDA, Culebra
Municipality of Culebra
CESFO, Boquerón
NOAA, Boquerón
OGPe, San Juan -
FEMA, San Juan -



Ing. Flavio Silva
Engineer
P.R. Ports Authority
Isla Gande
San Juan P.R.

Re: Reconstruction of Culebras Island Ferry Terminal Cargo Platform and Creation of a New Cargo Port.
Sub: Comments from NFMS Letter Dated June 01, 2015.

Dear Eng. Silva;

As per your request, I am herewith enclosing for your evaluation, the supporting arguments and rationale from Puerto Rico Maritime Transport Authority (PRMTA) Operations Department perspective, hoping that they will illustrate, and help establish the urgent need for the construction of the temporary ferry docking facilities at San Idelfonso, Ensenada Honda Bay in Culebra, whilst the island, only existing ramp is reconstructed, hopefully, before it structure evidences any further deterioration which could lead to its structural collapse.

The PRMTA Culebra terminal passengers and vehicular loading operations are conducted within a strip of a dead end of road approximately 200 ft. long which comprises what is considered by the natives, the islands municipality official waterfront area. West of this road there is a commercial activity cluster witch promotes personal transit to and from the water front for purchase of fast foods. Wihtin this limited strip of road the Authority conducts, both, the vehicular loading and stagin area as well as the passengers embarkation coordination within the following layout.

The ferry vehicle ramp is located at the northern extreme areas as well as the passengers embarkation coordinations with the following layout.of the road and the passenger terminal is located at the southern dead-end section. There are approximately, 175ft. of separation between both operations whith approximately 175ft of waterfront area currently used as the boarding facilities for MV Cayo Blanco, which is a 166 LOA (Length over-all) vessel. This linear distance barely meets the minimum distance (180ft.) required to properly moor the vessel to the waterfront area used as "pier" by this vessel, since the vessel requires front and stern lines to project beyond the vessels length to provide adequate handling of the vessel mooring lines loads components for adequate vessel mooring.

The existing passenger terminal facility at Culebra holds only 100 passengers, (as established by the P.R. Fire Fighting Department) whilst the passenger vessel tending the island, namely, Cayo Blanco, has a capacity of transporting 600 passenger. This means that the area inside the terminal cannot properly handle the traffic load imposed by the 600 passengers waiting to board the vessel, and at the same time, manage an equal amount of passengers disembarking this vessel. As a result of this situation, thereis a "spill-over" of passengers from the terminal that gather in the limited area north of the terminal and use it as an improvised waiting area.

As a result of all of the above, the inmediate area in the vicinity of the terminal is a turmoil of passengers and their personal belongings which is further complicated with the 256 additional passengers and vehicles staged in the same dead end road waiting for the arrival of the ferry with only approximately 20 minutes of separation between arrivals.

This existing, already crowded vehicular cargo and passenger activities are conducted within the Culebra terminal within what can be considered as the minimum, reasonable separation distance between the incidental island vehicular traffic to and from the terminal, the traffic brought about by

the ferry operations and the passenger displacement from the terminal to the island, this critical situation, as is, bears a high accident risk potential, which we have strived to avoid operationally through staggering the ferrys and passenger vessels trips.

This already complicated, critical, day to day operational framework within the Culebras terminal will be further complicated by the introduction of the construction barge and the necessary land and sea measures of the construction site requirements, which, when coupled to the prospect of installing a temporary ramp immediately adjacent to the ferry terminal whilst the existing ramp is being reconstructed, places this terminal operations as, simply put, unsafe... "An accident waiting to happen."

Regarding the discrepancy in ramp alternatives included on the previous PRMTA Administrations Construction Project Management (CPM) approach, as described on item 3 of your letter, its rather evident that all variables were not properly weighted-in on the previous evaluation exercise of the project logistics since the conditions are basically the same, except, maybe, to the fact that Cayo Blanco was out for repairs form 2012 to 2013. Having said that, the position as well as the strategy described under this 2012 CPM is not endorsed by the current PRMTA administration. We make an effort not only to avoid imposing any adverse effects to the environment, but to this administration, passenger safety is paramount, both, on our sea, as well as on our shore operations.

There are, however, some observations that we consider worth mentioning that will, hopefully, bring about some clarifications that will answer some of your valid concerns stated in your letter dated as of June 01, 2015 regarding the possible environmental adverse impact to be brought about by PRMTA future ferry operations at the San Idelfonso temporary facilities.

1. The docking facilities designed for this site were reduced to its simplest footprint, both in the water as well as the shore facilities. The pier to be constructed consists of a structural cement support structure anchored with piles to absorb the ferrys impact, and a 40ft x 50ft floating ramp with an expected draft of 18 inches. This structure will induce minimum disruption, if any at all, to the bay normal current flow patterns.
2. The piles to be used are to be screwed to the floor bed not hammered-in, thus reducing any acoustic stress to the eco-system.
3. The bay entrance navigation facilities, although adequate, will be significantly improved inside the bay through the installation of green buoys complementing the existing red buoys installed at the Starboard (right) side of the entrance, thus a complete navigation channel shall be demarked. Through the installation of this navigation structure, all recreational traffic navigating to and from the bay shall be required to conduct their navigation inside this channel thus reducing significantly the practice of recreational vessels navigating throughout the entire prairie and its adverse impact on the bays eco system.
4. The new navigation channel mean depth shall be 30+ ft which by far exceeds our fleets typical ferrys draft of 8ft.
5. This channel shall be demarked from the entrance to the bay to the mooring buoys facilities by Fish and Wild-life to protect the marine bed to as to ascertain that the intent of item 3 is fully met.
6. In addition, our vessels whilst navigating to and from the bay will conduct their sailing at 8-10 knots which constitute a safe speed for this type of operation with minimum interruption to the eco-system habitat.
7. I would like to, also, inform that PRMTA has a shared vested interest in the protection of the environment as vouched for by our past record of minimum environmental accidents and our environmental procedures in-place throughout our operations.

At the present, the Authority has an approved Non-tank Vessel Plan as well as a current e-NOI Certificate for each of our vessels. (See Appendix 1 & 2.). In addition, we have a complementary procedure for the proper fuel dispensing to our vessels. (See Appendix-3) and all our crews are duly trained on both procedures to assure that safety is maintained throughout our environmentally "Sensitive" operations.

If you have any need for further information and/or clarification with regards to any aspect of this communication, please feel free to contact our office at your earliest convenience for immediate compliance.

Cordially;

A handwritten signature in black ink, appearing to read 'Jose A. Bonanno', with a long horizontal flourish extending to the right.

Capt. Jose A. Bonanno
Deputy Executive Director of Operations, ATM.

Rivera, Marcia I

From: Milagros Rodriguez Castro <mirodriguez@prpa.pr.gov>
Sent: Monday, June 01, 2015 2:29 PM
To: Hernandez, Gabriel V
Subject: FW: FEMA, Reconstruction of Culebra Island Ferry Terminal Cargo Platform and Creation of New Cargo Port, HMGP-FEMA-DR-4017-PR

Buenas tardes:

Dame una llamada tan pronto leas esto.

MILAGROS RODRÍGUEZ CASTRO

Gerente en Asuntos Ambientales

ext. 3229, 3208, 3231



787-729-8863

"Escuchar la voz de la naturaleza es vivir en armonía con la fuerza creadora de Dios"

Anónimo, Piñones. 2007

"Creo en la determinación humana. A lo largo de la historia se ha comprobado que la voluntad humana es más poderosa que las armas"

Dalai Lama, 1935. Tibet



[This email and any files transmitted with it, are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email by error please notify us.]

From: Lisamarie Carrubba - NOAA Federal [mailto:lisamarie.carrubba@noaa.gov]
Sent: Monday, June 01, 2015 12:04 PM
To: Ayala, Jose
Cc: Alvarado garcia, Alwin; Melendez maiz, Marisol; Milagros Rodriguez Castro; Anabel Padilla
Subject: Re: FEMA, Reconstruction of Culebra Island Ferry Terminal Cargo Platform and Creation of New Cargo Port, HMGP-FEMA-DR-4017-PR

Saludos:

This is the additional information we requested in our letter that has not yet been issued. Changes to the project to address USFWS concerns may not address those of NMFS because we have different jurisdictions and species. If, as you note, these concerns have already been addressed and you can provide us with this information, please do so and we can set up a meeting to discuss this information and any other changes to the project.

Based on our review of the information that accompanied your February 5, 2015, letter, some of the information we previously requested was not included in the ESA Section 7 consultation documents that accompanied your letter. In addition, due to new ESA listings and our concerns regarding the construction of a new cargo pier such that there will be 2 permanent facilities of this kind on Culebra and the potential impacts of the construction and operation on ESA resources, we request the following in order to proceed with the ESA Section 7 consultation for proposed action:

1. Information regarding potential project effects to scalloped hammerhead shark, if applicable, based on data regarding the presence or absence of this species in the area of the existing cargo platform and the entire area to be impacted by the construction and operation of the new pier.
2. Information regarding potential project effects to Nassau grouper from the proposed repairs to the existing pier and the construction and operation of the new pier, including potential acoustic impacts from pile-driving. A thorough analysis of the potential injurious and behavioral impacts to sea turtles should also be provided. Avoidance and minimization measures to protect fish and sea turtles from potential acoustic impacts should be developed based on the acoustic analysis and provided as well. There are no calculations to support the proposed 100 meter radius as being protective of sea turtles and Nassau grouper for both injurious and behavioral impacts.
3. The information that accompanied your letter indicates that a site inspection was done in August 2010 and based on this inspection it was determined that the existing terminal platform is in need of repair. This August 2010 inspection is also used as the explanation as to why repairs cannot be done in such a way that all construction can be maintained in the area of Sardinias Bay where the passenger and cargo ferry terminals are currently located while operations are maintained. However, this was the proposal in 2012 and 2013 so it is not clear as to why it was feasible previously but not now. Because the area where the ferry operations are currently located is already impacted by decades of ferry operations, confining work to this area would reduce potential project impacts to ESA resources.
4. A thorough explanation as to why operations can't continue in Sardinias while the cargo terminal is repaired through the use of alternate facilities in the same area such as trestle piers, mooring buoys, or other temporary structures, and some demolition of aesthetic features that could then be reconstructed. One of the arguments against repairing the cargo terminal while vessel operations is on-going is due to the proposed use of a full-length turbidity barrier to limit potential impacts from sediment resuspension and transport outside the work area. This will be an issue regardless of whether or not cargo ferry operations continue in Sardinias Bay because passenger ferries will still be operating in the same area. In addition, there are alternatives to full-length barriers, such as those used by the West Indies Company and the Virgin Islands Port Authority, that ensure vessel operations don't need to be disrupted. It is also stated that there is no space in Sardinias for repairs and continued operation of the passenger and cargo terminals because the passenger and cargo ferries wouldn't fit in the area at the same time. Given that the published schedules for the cargo and passenger ferries show no overlap when both vessels are using the terminals at the same time, please explain how this is a deterrent to conducting repair work and continued vessel operation in Sardinias only.
5. It is stated that the reconstructed cargo terminal will have usage limitations that necessitate the construction of an alternate cargo terminal. Please provide a detailed explanation of these usage limitations and why they will not apply to the new cargo terminal at San Idelfonso.
6. Complete details regarding the future uses of the new cargo terminal at San Idelfonso, including the expected number of trips per day, size of vessels, and whether vessels other than cargo ships will use this area. The dimensions of all proposed in-water structures should also be provided, including catwalks and other structures.
7. An analysis as to whether the existing Aids to Navigation (ATONS) that mark the entrance to Ensenda Honda, which is currently used by recreational vessels, will be adequate to mark the entrance channel and navigation route for the new cargo terminal. If not, please provide details of the locations of new ATONS, as well as the type of ATON to be installed, their locations, and their anchoring systems.

8. Details regarding accidental groundings that have occurred in Sardinas Bay as a result of cargo or passenger ferry operation and at the entrance to Ensenada Honda from recreational or commercial vessel traffic in order to assess the potential impacts of the operation of the new cargo terminal on ESA-listed corals and designated critical habitat for elkhorn and staghorn corals and green sea turtles.
9. The use of spud barges has been shown to cause relatively deep holes that lead to entrapment of organisms such as conch and take a long period of time to recover naturally. Please provide information regarding monitoring of spud holes associated with the construction of the new cargo terminal and the replacement of existing piles in Sardinas Bay and measures to minimize damage to sea turtle habitat in particular from spud holes.
10. A detailed water quality monitoring plan for the construction and operation of the new cargo terminal should be provided. The plan should include sampling locations and methods to set thresholds for measures such as turbidity. The plan should detail mitigation strategies should threshold values be exceeded outside the work area during construction and operation of the facilities. Threshold values should also be set for the repair work in Sardinas Bay in order to ensure that the project does not result in impacts to ESA resources outside the construction footprint. A value of 50 nephelometric turbidity units is cited in the consultation documents with no information as to where this number came from. This value is beyond that found to impact corals so it is not an appropriate threshold for areas outside the construction footprint for both phases of the project. A biological monitoring plan should also be developed to determine the potential impacts of the construction and operation of the new cargo terminal on ESA-listed corals that may be present in Ensenada Honda and at the entrance to the bay, as well as green sea turtle critical habitat.
11. The new cargo platform is not close to the main population center on Culebra or the commercial facilities likely to be served by the terminal. The existing road is very narrow and was likely not designed for the loads that it will carry if the new cargo terminal is constructed. Therefore, details of all improvements that need to be made to existing roadways, wetland crossings, and other areas that could impact ESA resources due to runoff of sediments and other contaminants in stormwater runoff should be provided.
12. A sea turtle survey plan should be developed in coordination with NMFS Protected Resources Division for implementation in order to determine the use of the project area by different species of sea turtles so that avoidance and minimization measures can be developed for the new cargo terminal during both its construction and operation. An analysis of potential vessel strikes, including the time, number, and size of vessels expected to use the new facilities should be provided in order to determine the potential extent of impacts to sea turtles from the operation of the new cargo terminal. Existing sea turtle survey data may also be used if available from the Puerto Rico Department of Natural and Environmental Resources.
13. Information regarding current-driven and wave-driven transport patterns in the area where the new cargo terminal is proposed in order to analyze the potential impacts of the project on ESA resources during construction and operation. This information should also inform the design of the water quality and biological monitoring plans.
14. Details of the proposed construction methods for both the new cargo terminal and the repair of the existing facilities. This information should also include any proposed maintenance programs for both facilities.
15. Bathymetry of the proposed cargo terminal, turning basin, and navigation channel. It is stated in the consultation document that accompanied your letter that the U.S. Coast Guard (USCG) maintains the channel so depths are adequate. The USCG maintains the ATONS, which are federal, but has not performed maintenance dredging or channel surveys based on a review of our project files. Please provide information regarding the depths in the areas that will be used for navigation to and construction and operation of the new cargo terminal as well as the draft, number and size of all vessels to be used during construction and operation.

16. A complete copy of the benthic survey for the new cargo terminal and proposed repair footprint for the existing cargo terminal including all areas of temporary and permanent impacts, transect locations, survey methods, and photographs with identified locations along transects. The benthic survey should identify the location of ESA-listed corals, elkhorn and staghorn coral critical habitat, and green sea turtle critical habitat in relation to all components of the new cargo terminal (navigation channel, turning basin, piers and other structures) and the existing cargo terminal. The consultation documents did not include the complete benthic survey.

If the additional information allows us to determine that an informal section 7 consultation can be completed, NMFS will respond within 30 calendar days if possible. Otherwise, if NMFS determines that a formal Section 7 consultation is necessary, Section 7 allows NMFS up to 90 days to conclude formal consultation with your agency and an additional 45 days to prepare our Biological Opinion once we have received all the information necessary to initiate consultation. The ESA requires that, after initiation of formal consultation, the federal action agency must make no irreversible or irretrievable commitment of resources that limits future options. This practice ensures agency actions do not preclude the formulation and implementation of reasonable and prudent alternatives that avoid jeopardizing the continued existence of endangered or threatened species, or destroying or modifying their critical habitats.

The project may also require an essential fish habitat (EFH) consultation with the NMFS Habitat Conservation Division (HCD). Please contact Mr. José Rivera at [787-405-3605](tel:787-405-3605) or Jose.A.Rivera@noaa.gov for additional information regarding EFH consultation requirements.

On Thu, May 28, 2015 at 10:00 AM, Ayala, Jose <Jose.Ayala3@fema.dhs.gov> wrote:
Saludos Lisamarie,

We are aware of the lack of response from your regional office, there are things out of your control. The truth is that a response letter from your office requesting more information is academic at this point. We have worked with the applicant to resolve the Section 7 ESA issues of concern that you and the FWS had with the proposed project. FEMA and the Ports Authority have worked to modify the project to provide resolution to most of your concerns as expressed from previous meetings and from the email you sent to CZM and USACE.

Since there are changes to the SOW as result of these discussions with resource agencies we need to sit down with you as soon as possible as we did with FWS to discuss these changes and resolve any pending issues in order to finalize the EA and complete the review before the expiration date of September 15, 2015 for the funding of the first phase of the project.

We will be available to meet with you at your earliest convenience. Just set the day and time, we are willing to meet you at your office in Cabo Rojo.

Hoping to hear from you soon.

Sincerely,

Jose

Sent with Good (www.good.com)

From: Lisamarie Carrubba - NOAA Federal

Sent: Tuesday, May 26, 2015 2:53:01 PM

To: Ayala, Jose

Cc: Alvarado garcia, Alwin; Melendez maiz, Marisol; Milagros Rodriguez Castro; Anabel Padilla

Subject: FEMA, Reconstruction of Culebra Island Ferry Terminal Cargo Platform and Creation of New Cargo Port, HMGP-FEMA-DR-4017-PR

Saludos José:

I am writing to let you know that I sent an inquiry to my regional office regarding the status of our letter requesting additional information for the Culebra ferry project but have never received an answer. I sent our draft letter at the beginning of March but the letter has still not completed review.

Therefore, I am requesting that you contact my regional office directly to inquire as to why this letter still has not been finalized and remind them of your funding deadline.

Please contact Mr. David Bernhart, Assistant Regional Administrator, Protected Resources Division at [727-551-5167](tel:727-551-5167) or david.bernhart@noaa.gov.

If you are unable to get a satisfactory response from David, please contact Ms. Heather Blough at [727-551-5795](tel:727-551-5795) or heather.blough@noaa.gov, who is the Special Assistant to the Regional Administrator.

Thank you,
Lee

--

Dr. Lisamarie Carrubba
NOAA Fisheries
Caribbean Field Office, PRD
P.O. Box 1310
Boquerón, PR 00622
[787-851-3700](tel:787-851-3700)
[787-851-5588](tel:787-851-5588) (fax)

--

Dr. Lisamarie Carrubba
NOAA Fisheries
Caribbean Field Office, PRD
P.O. Box 1310
Boquerón, PR 00622
787-851-3700
787-851-5588 (fax)

The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.

Perez, Francisco

From: Perez, Francisco
Sent: Friday, May 29, 2015 12:05 PM
To: Maria Coral Sánchez (Email)
Cc: Ivette Rodríguez (Email); Milagros Rodríguez Castro (Email)
Subject: Terminal del Ferry de Culebra - Mejoras a Terminal del Ferry de Carga, Bahía de Sardinias, Culebra

Ms. María Coral Sánchez
Directora Ejecutiva
Autoridad de Conservación y Desarrollo de Culebra
P.O Box 217
Culebra, PR 00775

Cc: Ivette Rodríguez

Asunto: Mejoras a Terminal del Ferry de Carga, Bahía de Sardinias, Culebra
JP No. 1397
JP: CZ-2015-1120-050
USACE: SAJ-2002-01425 (SP-JMS)
FEMA: HGMP FEMA-DR4017-PR

Estimada Directora Ejecutiva:

La Autoridad de los Puertos de Puerto Rico (APPR) solicita, por la presente, su insumo al respecto del proyecto en epígrafe. A continuación un enlace para que acceda el documento ambiental (EA Preliminar) preparado para la acción propuesta junto con sus anejos técnicos.

Secure File Downloads: Available until: **03 June 2015**. Click link to download: [EA Plus Appendices.zip](#) 58,046.68 KB

En resumen, la Rampa del Ferry del Terminal de Culebra en Bahía Sardinias (Rampa del Ferry) se encuentra en tal estado de deterioro que ya no es económicamente viable repararla. La Rampa del Ferry es la única disponible para carga en la Isla de Culebra. Bahía Sardinias frecuentemente recibe marejadas y vientos que imposibilitan el atraque de los ferries de carga. El espacio y facilidades físicas en la Terminal del Ferry no permiten su rehabilitación y su operación simultánea. Por estas razones, la acción propuesta también incluye la construcción de una Terminal Auxiliar para el Ferry de Carga. Luego de evaluar alternativas de ubicación para la Terminal Auxiliar se seleccionó como la más apta el área de San Ildefonso.

La EA ilustra en detalle la acción propuesta y define los impactos previstos y los compromisos de APPR. Durante las obras de construcción en San Ildefonso, período estimado en seis meses, ciertas áreas del pavimento y estacionamiento tendrán trabajos de excavación que en ocasión impedirán un libre acceso. Refiérase a la huella del proyecto en la EA, Figura 5, página 23. A raíz de las reuniones que hemos sostenidos con varias agencias hemos identificado asuntos adicionales a los atendidos en la EA Preliminar y las

medidas de mitigación correspondiente, las cuales proponemos incluir en la EA Final, incluyendo:

1. El Quit Claim Deed de 1982 (QCD), documento mediante el cual el Departamento del Interior le cede al Gobierno de Puerto Rico el usufructo de los terrenos de San Ildefonso, será modificado, ya que sólo permite usos recreativos. El Departamento del Interior en su carta del 7 de enero de 2015 indicó no tener objeción a la acción propuesta. Las modificaciones al QCD incluirán el uso propuesto y limitaciones de uso para la Terminal Auxiliar, incluyendo:
 - a. que sea utilizada sólo para ferries de ATM,
 - b. que sea utilizada sólo durante el período de aproximadamente seis meses que tomará la reconstrucción de la terminal en Bahía Sardinas,
 - c. que en adición a eso sea utilizada sólo: Durante situaciones de emergencia, durante periodos en que las condiciones climáticas no permitan atracar en Bahía Sardinas, o durante periodos en que la demanda de transporte a/de Culebra rebasen la capacidad del terminal en Bahía Sardinas.
2. Por razones de la seguridad, protección y bienestar, durante el período de construcción en San Ildefonso se coordinará con el contratista de construcción para proveer el mayor acceso posible al personal y vehículos de la Autoridad de Conservación y Desarrollo de Culebra, del Servicio de Pesca y Vida Silvestre, del Refugio de Vida Silvestre, del Cuerpo de Vigilantes, de la Guardia Nacional, de Recursos Naturales y de la Autoridad de Acueductos y Alcantarillados. Luego de completada la construcción se retornarán las condiciones para que exista libre acceso a las facilidades.
3. Se implementará el protocolo de protección a la Boa de Islas Virgenes (*Epicrates monensis granti*) durante la actividad de construcción.
4. Para mitigar los impactos que pueda causar la operación del ferry en San Ildefonso debido a la resuspensión de sedimentos se propone:
 - a. Instalar una cortina de control de turbidez permanentemente para proteger la calidad de agua en la toma de la planta desalinizadora de la AAA.
 - b. Instalar 4 boyas de amarre en el área de Almodóvar (Las Pelás), según acordado con FWS y DRNA. Estas boyas protegerán aproximadamente 8 acres de praderas de hierbas marinas existentes para compensar por el impacto que la resuspensión de sedimentos pueda tener sobre las aproximadamente 0.85 acres de *Thalassia testudinum* adyacente a la huella del proyecto.

APPR ha instalado en la Terminal del Ferry afiches en inglés y español resumiendo la acción propuesta, ha provisto la Alcaldía y la Biblioteca Comunitaria de Culebra con copia de la EA, y ha establecido una dirección electrónica para que el público pueda participar con su insumo al respecto (culebrapier@APPR.pr.gov).

Esperamos que este comunicado sea informativo y adecuado. Quedo a su disposición para aclarar cualquier inquietud que pueda surgir. Puede comunicarse conmigo a los números que aparecen al fondo. También puede comunicarse con Milagros Rodríguez Castro, Gerente Ambiental de la APPR, aquí copiada, y al (787) 729-8715 x 3229.

Cordialmente,

Francisco Pérez Aguiló, M.S., REM
Senior Project Manager, Atkins Caribe

ATKINS

Thought leadership in a complex world – www.atkinsglobal.com/angles

Metro Office Park 8 Suite 102, Guaynabo, Puerto Rico 00968-1705

Tel: +1 (787) 294 2010 X-430-1225 | Fax: +1 (787) 294 2002 | Cell: +1 (787) 439-5768

Email: francisco.perez@atkinsglobal.com | Web: www.atkinsglobal.com/northamerica | Careers: www.atkinsglobal.com

Perez, Francisco

From: Microsoft Outlook
To: Maria Coral Sánchez (Email); Ivette Rodríguez (Email); Milagros Rodríguez Castro (Email)
Sent: Friday, May 29, 2015 12:05 PM
Subject: Relayed: Terminal del Ferry de Culebra - Mejoras a Terminal del Ferry de Carga, Bahía de Sardinias, Culebra

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

[Maria Coral Sánchez \(Email\)](#)

[Ivette Rodríguez \(Email\)](#)

[Milagros Rodríguez Castro \(Email\)](#)

Subject: Terminal del Ferry de Culebra - Mejoras a Terminal del Ferry de Carga, Bahía de Sardinias, Culebra

Sent by Microsoft Exchange Server 2007

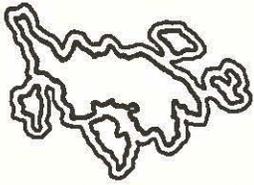
Perez, Francisco

From: Edwin Rodriguez <edwinrod007@gmail.com>
Sent: Friday, May 29, 2015 7:50 AM
To: Perez, Francisco
Subject: Boyas de amarre

Las boyas se consiguen en Astro Industrial. Auq le sugiero que contacten a Pedro Rodriguez de la compañía SeaVentures al (787)342-6952 (pedrocoralrestoration@gmail.com). Este puede adquirir todo el sistema de amarre y de anclaje y llevar a cabo la instalación. El ha hecho trabajos de este tipo anteriormente para el DRNA.

Le recomiendo q si puede sugerirle a AP que utilice el sistema Helix Anchor como sistema de anclaje. Pedro Rodriguez conoce del sistema.

The IS team in Atkins has scanned this email and any attachments for viruses and other threats; however no technology can be guaranteed to detect all threats. Always exercise caution before acting on the content of an email and before opening attachments or following links contained within the email.



ESTADO LIBRE ASOCIADO DE PUERTO RICO
GOBIERNO MUNICIPAL DE CULEBRA

OFICINA DEL ALCALDE
CULEBRA, PUERTO RICO 00775



12 de mayo de 2015.

Ingrid C. Colberg Rodríguez
Executive Director
Puerto Rico Ports Authority
P.O. Box 362829
San Juan, P.R. 00936-2829

As we all know, The Puerto Rico Ports Authority (PRPA) is conducting the reconstruction of the Culebra Ferry Terminal Cargo Platform, located in Dewey, Culebra, Puerto Rico. This is the main entrance to the island, so it will require the construction of an alternate facility to continue the cargo operations during reconstruction activities.

The place that has been selected by PRPA to set up these alternate facilities is the San Ildefonso Sector. As far as I know, this site would have the advantage of performing docking operations during weather conditions that would not allow it on the current ramp. This is due to its bay configuration.

The Municipality of Culebra has no objection to the construction of the alternate facilities at San Ildefonso Sector, understanding that the selection of this site is the result of an in-depth analysis of alternatives. Furthermore, I would like to make it clear that the construction should fully comply with all the environmental and government agencies requirements. The PRPA will maintain informed the municipality of all the details, specifications and development of the project. Both mitigation and construction methods shall be made according to the approved submitted documents and construction drawings.

Cordially yours,
William I. Solís Bermúdez
Mayor, Municipality of Culebra



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Caribbean Islands National Wildlife Refuge
P.O. Box 510, Carr. 301, Km. 5.1
Boqueron, Puerto Rico 00622

May 7, 2015

Eng. Romel Pedraza, P.E.
Studies and Engineer Chief
P.R. Ports Authority
PO Box 362829
San Juan, PR 00936-2829

Re: Rehabilitation of Culebra Cargo Pier
Culebra, Puerto Rico

Dear Mr. Pedraza:

The Culebra National Wildlife Refuge (Culebra NWR) acknowledges the receipt of a set of drawings pertaining to the construction of a new auxiliary cargo facility to be constructed in the San Idelfonso area, Culebra Puerto Rico. The new facilities consist of a floating dock; parking, road improvement and other features.

According to the information provided in a conference call, the construction of these facilities responds to the need to conduct repairs to the currently existing dock facilities at Dewey and once the existing cargo pier is repaired, operations will return to that site. The facilities in San Idelfonso will be kept as auxiliary docking facilities in the event of inclement weather, or other emergency issues. It is important to clarify that this project has not been previously submitted for the review of the Culebra NWR. Previous comments on this project provided by the U.S. Fish and Wildlife Service (USFWS) on meetings, environmental document (EA), and project plans are those submitted by the Ecological Services Division of the Caribbean Field Office, not by the Culebra NWR.

The Culebra NWR is one of nine refuges in the Caribbean managed by the USFWS as part of the Caribbean Islands National Wildlife Refuge Complex. The Refuge objective and purpose is to administer the lands as a wildlife refuge and breeding ground area for native birds, for its particular value in carrying out the national migratory bird management program and of the conservation and management, and restoration of the fish, wildlife, and plant resources and their habitats for the benefit of present and future generations. To achieve this mission, the Culebra Refuge manages approximately 1,500 acres of land including 22 smaller islands and cays that comprises the Culebra archipelago. The Refuge headquarters and other facilities are located in close proximity to the project site.

TAKE PRIDE[®]
IN AMERICA 

The auxiliary cargo facility will be constructed in the area known as "Campamento" (or Lower Camp), and corresponds to Tract 1k (map enclosed) of the lands released and quitclaimed to the Commonwealth of Puerto Rico by the Department of the Interior. These lands, as stated in the Quitclaim Deed document, are subject to reservations, exceptions, restrictions, conditions and covenants. These were mutually agreed upon by both agencies and in accordance with a Cooperative Management Agreement signed in 1982, for the conservation and development of the natural and cultural resources (including wildlife and associated habitats with particular emphasis on threatened and endangered species).

Besides the restriction for the littoral areas of being used only for public recreation with only minimal facilities provided, in accordance with 1973 Joint Report entitled: "Culebra: A Plan for the Conservation and Development" prepared by both governments, there are other reservations and privileges for this site granted in the Quitclaim Deed document. On Page 4 of the Agreement, it describes the reservation by the Grantor (Dept. of the Interior) of the right to use the boat ramp and pier facility located in the Camp Area. The pier located adjacent to the project site and the existing ramp (the closest to the proposed cargo ramp) is currently used by the Culebra NWR and PR Department of Natural Resources (DNER) to dock their boats. The existing ramp is also used by the PR National Guard during their training and exercises for emergency situations in Culebra. These are the only government docking facilities currently existing in Culebra Island from which daily duties are performed, as well as the response to emergency situations such as boat groundings, lost divers, etc. The Culebra NWR and the PR DNER are the only two agencies which have boats to respond to emergency situations in Culebra.

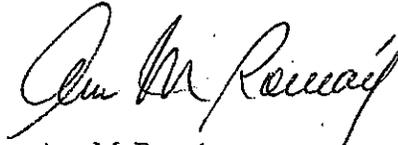
According to the drawings submitted, this fact was not taken into consideration in the project plans. The Auxiliary Cargo facilities includes not only a ramp but also a new terminal and their development and operations appear to interfere with docking and launching of official boats used by different agencies. The use of the existing facilities is critical to fulfilling the mission of the Culebra NWR. Therefore the applicant should consider the reservations mentioned above and all other requirements for the planned development and management of lands on the island of Culebra transferred to the Commonwealth of Puerto Rico pursuant to the 1973 Joint Report and the Quitclaim Deed prior to submitting project plans and drawings to the regulatory agencies. Special consideration should be given to Section III.B.2 of the Quitclaim Deed which specifies that: "Any development project including, but not limited to, new communities, hotels, sewage treatment plants, or major recreational developments (over \$15,000 in cost) must have advanced approval of both the Culebra Conservation and Development Authority and the U.S. Fish and Wildlife Service.", and Section IV of that same document.

Mr. Pedraza

3

Thank you for the opportunity to provide comments on this project. If you have any questions, please contact me at (787) 851-7258, extension 305, or Susan Silander, Caribbean Is. NWR Complex Project Leader at extension 306.

Sincerely,



Ana M. Román
Deputy Project Leader
Caribbean Is. NWR and
Culebra NWR Manager

Attachments (Culebra map & Quitclaim Deed)

cc:

USCOE, Regulatory Section, San Juan

PRDNER, San Juan

ACDEC, Culebra

Municipality of Culebra

CESFO, Boquerón

NOAA, Boquerón

OGPe, San Juan

FEMA, San Juan



April 1, 2015

Mr. Alejandro R. De La Campa
Disaster Recovery Manager
US Department of Homeland Security
PO Box 70105
San Juan, Puerto Rico 00936-8105

**Re: Responses to USF&WS Comments, from your March 17, 2015 Letter
Hazard Mitigation Grant Program, FEMA-4017-DR-PR, Project-0030
Structural Rehabilitation of the Culebra Cargo Pier, Puerto Rico Ports Authority**

Dear Mr. De La Campa:

On March 17, 2015, we received a letter from FEMA regarding the comments by the US Fish and Wildlife Service (USFWS) concerning the Environmental Assessment (EA) and the Endangered Species Consultation for the rehabilitation of the Culebra Cargo Pier. Based on the USFWS comments, FEMA requested the Puerto Rico Ports Authority (PRPA) to address the following items:

1. The EA does not mention other possible uses for the auxiliary cargo facilities.

Response: The EA mentions only the use for which it is designed. There are no other proposed uses for the auxiliary cargo facilities. For instance, the existing Ferry Terminal does not have other uses. The design elevation of the terminal is not adequate for other uses. For instance, it is too high for recreational boating.

PRPA and FEMA propose to include in an agreement with the owner of the property, the Department of Interior, the uses for which the Auxiliary Terminal at San Ildefonso it is intended and authorized, namely:

For all cargo ferry movements during the re-construction of the Culebra Ferry Terminal at Sardinias Bay.

Beyond the above-mentioned period, for ferry operations during periods that the Culebra Ferry Terminal at Sardinias Bay is unfit for service, due to weather conditions, extreme passenger volume events and emergencies.

2. Based on the Fish & Wildlife coordination Act, the following comments and recommendations are that federal agencies' are responsible to address and consider direct, indirect and cumulative impacts in the National Environmental Policy Act (NEPA) process as established in the Council of Environmental (CEQ) Regulations for Implementing the Procedural provisions of the NEPA. Thus, the USFWS believes that the project may have indirect and cumulative impacts on wetland resources along the road that connects the facility to the town of Dewey... Any widening or improvements to the road to facilitate the increased use of cargo traffic, could impact the adjacent mangroves and marine ecosystems.

Response: There is no proposed or needed widening of roads associated with the proposed action (other than at San Ildefonso per se), and therefore no indirect and cumulative impacts on wetland resources along the road that connects the facility to the town of Dewey, or associated impact to mangroves and marine ecosystems. The proposed action will not increase the vehicle traffic that presently arrives through the existing Terminal, it will only move the access point into Culebra for approximately six months, and thereafter as outlined in #1 (above) to maintain the movement of cargo to the island.

What follows is a summary of the vehicle activity through the ferry system, as provided by the PR Maritime Transport Authority (MTA): Culebra ferries transport a maximum of 24 vehicles per trip, or four trailers (52 foot maximum, with cabin) with twelve vehicles, or a combination thereof. The largest weight for a truck or trailer that can be loaded in the ferries is 80,000 pounds, where an average vehicle weighs 9,000 pounds. There are three cargo ferries per day (6:30 am, 1:00 pm and 5:00 pm), so the total maximum number of vehicles that move through the existing terminal is 72 vehicles incoming and 72 vehicles outgoing, for a total traffic of 144 vehicular movements in a 24 hour period. Also, there are between 1,000 and 1,200 passengers transported daily between Fajardo and Culebra.

There are three State Roads in Culebra: PR-250, PR-251 and PR-252. Once a vehicle is in Culebra it moves unrestricted to all points in the island. PR-250, which connects the town of Dewey with the proposed San Ildefonso Auxiliary Terminal, presently serves part or all of the same cargo and light traffic that will be served once the San Ildefonso Auxiliary Terminal is in operation. Please refer to the Traffic Impact Study (Appendix E of the EA) for details of impacts to traffic of the proposed action.

Presently, the vehicles that disembark at the Ferry Terminal in Sardinias Bay use PR-250 to reach their destinations outside of the town of Dewey, in route to homes, hotels, restaurants, beaches, construction sites, the airport, etc. throughout the Island. Traffic that disembark from the existing terminal (maximum of 24 vehicles per incoming and outgoing trip, three trips per day, for a maximum total of 72 vehicles incoming and 72 vehicles outgoing in a 24 hour period), including heavy vehicles (loaded trucks, construction equipment, etc.) use PR-250 to reach the eastern side of the Island. Some of the traffic does not make it to San Ildefonso, but some of it does, and beyond. Nevertheless, the PR-250 has adequately served the Island to date, and the proposed action will not cause an increase in vehicular traffic to Culebra.

During the six month construction period at Sardina, and also during events as outlined in #1 (above), ferries will arrive at San Ildefonso instead of at Sardinias, delivering vehicles, some of which will head west towards Dewey, and some will head east on the eastern portion of PR-250. This will cause a net reduction in traffic congestion within Dewey and near the School (Escuela Ecológica).

3. In an effort to minimize impacts due to sediment resuspension, the proposed auxiliary cargo dock was extended into deeper water. The project drawing should reflect that the end of the pier is now in the 19-20 foot depth contour.

***Response:** Figure 6 on Pg. 24 of the EA illustrates the conceptual design location of the auxiliary dock, which was approximately at the 13 foot deep contour line. The berthing area depth varied from 13 to 24 feet. After the pier was extended, per USFWS' request, the end of the dock is now proposed at 17 feet, with a berthing depth of 17 to 24 feet. See enclosed bathymetric survey with the ferry outline.*

The existing terminal at Sardinias Bay has an 11 to 15 foot berthing depth (see enclosed bathymetric survey of Sardinias Bay), a depth that does not appear to cause extraordinary sediment resuspension. The likely reason for this observation is that most of the light sediments under the berthing area were likely resuspended during the first few ferry operations; afterwards, only the non-suspendable coarser materials remain. Presently at Sardinias Bay, the sediment resuspension is minimal with the daily ferry operations. This is the anticipated effect at San Ildefonso.

Increasing the size of the auxiliary cargo dock by approximately 20 feet into deeper water would increase the adverse shading effects to the seafloor. Even though there are no seagrass beds under the project footprint, there are patches of Halophila decipiens and mat algae, which thrive under light conditions (primary productivity). Extending the source of the shading from the presently proposed 3,440 to 4,607 square feet or 34% larger, would be a known, permanent, additional adverse impact by shading. In contrast, the impact of sediment resuspension for a temporary operation consisting of three ferries per day during the six month construction period at Sardina, and beyond that during events as outlined in #1 (above), would be an intermittent effect of uncertain magnitude.

True, extending the dock into deeper waters will increase the distance between the ferry propellers and the seafloor, which could decrease the amount of sediment resuspension in the berthing area. However, the cost associated to extending the floating pier approximately 20 feet in length to reach 19 to 20 feet depth is estimated at an additional \$600,000, which is a 23% increase from the estimated \$2.56M cost of the proposed San Ildefonso Auxiliary Terminal. PRPA respectfully requests reconsideration by the USF&WS of their request to extend to 19 to 20 feet the depth of the San Ildefonso Auxiliary Terminal given the dire fiscal condition of the central government and its agencies (the source for the \$600,000), in light of the 11 foot depth of the existing Sardinias Bay Terminal, and the experience with sediment resuspension there.

4. A. The EA estimates impacts to the marine ecosystems based only on the structural footprint of the dock (.08 acres) and not on the project site limits as shown in the various project drawings. It states that impacts will be limited to pile placement and shading by the pier and considers the future colonization of the concrete piles by marine organisms to be sufficient compensatory mitigation. The USFWS recommends that limits of the project site be used to calculate the project impact.

Response: Section 5.0 of the EA includes potential impacts to a variety of resources, not just the 0.08 acres of seafloor impact. Impacts considered include Climate Change, potential spills, the entire footprint of the upland improvements at San Ildefonso, and stormwater—both during construction and during operation. However, we did not quantify the berthing area at San Ildefonso, or the area directly under the ferry while moored. That area is now estimated at 3,000 square feet or approximately 0.7 acres. This is the area that will receive most of the thrust impact from the propellers (sediment resuspension) during ferry movements: six movements per day during the six month reconstruction period at Sardinias, and also during events as outlined in #1 (above). Beyond the berthing area, the water depth is 25 foot or deeper, and the thrust effect of ferries with approximately 10 foot draft is not anticipated to impact the seafloor.

4. B. Also, the EA states that during ferry operations water turbidity may increase during docking and undocking. This could cause additional indirect impacts to adjacent marine ecosystems. Since this facility will continue to be used after the main cargo pier is repaired, impacts will continue throughout the life of the project. The Applicant should consider additional mitigation opportunities to compensate for these long term project impacts.

Response: Upon their review of the EA and its appendices, the PR Department of Natural and Environmental Resources (DNER) initiated conversation with PRPA with regards to compensatory mitigation for all impacts associated with the construction and operation of the San Ildefonso Auxiliary Terminal, including impacts associated with increased turbidity caused by the operation. The PRPA will keep FEMA and the USFWS abreast of the results of these negotiations.

Comments were issued regarding the information provided in the USFWS Endangered Species Act (ESA) Section 7 Consultation.

1. Page 13 of ESA Consultation; the species list does not include the Virgin Island (VI) Tree Boa (*Epicrates monensis granti*). This species is currently known from this site and adjacent lands.

Response. Despite not listing the VI Tree Boa on Page 13 of ESA Consultation, the document does address this species. We regret the omission.

2. Page 48, VI tree boa, Section 5.3.3, Current Range. This species is classified as a subspecies of the Mona Island boa (*Epicrates monensis*) and not the Puerto Rico boa (*Epicrates inornatus*) as stated in this section.

Response. We stand corrected.

3. Page 48, VI tree boa. The proposed upland work at San Ildefonso will include road widening, clearing of vegetation for parking, and other work. This section concludes that the VI boa is not expected to be found in the project area. However, personal communications with U.S. Fish and Wildlife Service Refuge staff of Culebra indicates that the San Ildefonso area is known to harbor VI boas. Therefore, the USFWS does not agree with your determination that the project will not affect the VI tree boa.

Response. The upland section of the proposed footprint consists mainly of maintained (mowed) grasses within a PR Electric Power Authority easement. The project footprint includes 33 trees, most of which were planted as ornamentals, and are widely and evenly spaced along the west side of the existing access road to the San Ildefonso boat ramps; so their branches do not intertwine, in general. The Virgin Islands Tree Boa habitat, characterized by "a minimum of three trees with interdigitating branches" is clearly not present within the project's footprint (see enclosed Tree Inventory of the upland section of the project in San Ildefonso and see enclosed Photo-Documentation of the site). A possible habitat patch for the species was found west of the project footprint, where a patchy growth of white leadtrees (*Leucaena leucocephala*) and acacias (*Acacia* spp.) are present. This location is north of the historic building and south of the DNER housing.

However, this is a mobile species, which may be found in the surrounding dry forest habitat, and has been reported in the San Ildefonso area. Therefore, PRPA is willing to concede that individual VI Tree Boas may be affected by construction of the proposed action.

4. The USFWS recommends that for the VI Tree Boa, the upland area be evaluated using the protocols developed in the USVI for determining boa habitat. Boa habitat suitability for the upland areas to be impacted should be established and reported to the USFWS. Once construction starts, conservation measures to minimize boa impacts during construction should be implemented (see enclosures). The USFWS believes that the implementation of these measures would result in a "may affect but is not likely to adversely affect" determination for the species.

Response. The PRPA is willing to concede that individual VI Tree Boas may be affected by construction of the proposed action, and is willing to implement the "Culebra Cargo Ferry VI boa Conservation Measures", protocol provided with the March 2, 2015 USFWS letter. Since implementation of the subject protocol would result in a "may affect but is not likely to adversely affect determination", the PRPA respectfully requests reconsideration by the USF&WS to their request for a Tree Boa Habitat Survey.

An official evaluation of the VI Tree Boa using the March 2006 Tree Boa Habitat Survey protocol will require the contracting of such services by qualified personnel. Seeking funds to cover such additional expenditure and (in the event that the funding is successfully allocated) the procedure

involved in the contracting for such services could take several months—even if the survey report itself can be completed in a couple of weeks. On the other hand, the conservation measures for the VI Tree Boa can be practically implemented by the contractor, which will already provide a sea turtle and manatee observer during project construction.

5. With regard to the Antillean manatee, the applicant has provided conservation measures to be implemented during construction. Based on the habitat characteristics and these measures, the USFWS concurs with the determination that the project is not likely to adversely affect these species.

Response. Noted.

6. With regard to the roseate tern, the USFWS concurs with the determination that there is no effect to the species by this project.

Response. Noted.

Based on the comments of the USFWS, we are requesting PRPA to perform the suggested changes to the EA and evaluate the project area using the protocols developed in the USVI for determining the VI tree boa habitat and present these mentioned changes to FEMA.

Response. PRPA respectfully requests that the responses provided with this letter, if acceptable to FEMA, be incorporated as an addendum to the EA.

PRPA sincerely hopes that these responses are to FEMA's satisfaction. PRPA is committed to the protection of the environment, and is eager to address concerns from expert agencies in their field. PRPA is constrained by budget limitations and by an urgency to provide Culebra with facilities that will reliably provide essential services to residents and visitors, and therefore, requests the cooperation of all concerned to expedite these procedures.

Sincerely,



Jorge R. Suárez Pérez-Guerra
Assistant Executive Director for
Planning, Engineering & Construction

Enclosures: Bathymetric survey of Sardinias Bay
Image of San Ildefonso proposed pier over bathymetric survey
Bathymetric survey of Ensenada Honda at San Ildefonso
Tree Inventory of the San Ildefonso site
Photographic Documentation: San Ildefonso



MAR 3 0 2015

Gabriel Hernández - Atkins Caribe, LLP
Metro Office Park
Lote 8 Calle 1, Suite 102
Guaynabo, Puerto Rico 00968

Estimado señor Hernández:

Autoridad de los Puertos de Puerto Rico
Terminal Ferry Culebra
Reconstrucción y Reparación de Rampa
Playa Sardinas, Culebra
O-BD-CZM01-SJ-00530-17112014
Solicitud Conjunta Núm. 1397

Luego de evaluar los documentos que han sido radicados continuamente como parte de su Solicitud de Concesión, tenemos los siguientes comentarios y/o requerimientos que deberán ser atendidos para continuar con la evaluación de su caso:

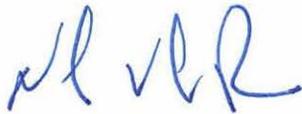
1. A continuación, nuestros comentarios, los cuales deberán ser atendidos:
- Los documentos de la Solicitud Conjunta y el Documento Ambiental no toman en consideración el impacto que tendrá sobre las especies protegidas la operación del ferry debido a ruido, turbidez y contaminación. La contaminación por ruido provoca el desplazamiento de especies protegidas de su hábitat. De igual manera, la re-suspensión de sedimentos durante el proceso de atracar y salida del ferry tendrá un impacto en el área del proyecto y sistemas cercanos. A esto se suma la contaminación por aceites, pintura y otros químicos asociados con la operación de la embarcación y sus motores.
 - En los documentos se menciona que la presencia del manatí es pasajera y ocasional, lo cual es erróneo porque tenemos documentado el nacimiento de la especie en dicha zona y su permanencia en el lugar. A esto se debe la colocación de boyas para la regulación de la velocidad de embarcaciones en el lugar. De igual manera, las tortugas marinas se verían afectadas por el ruido y contaminación asociadas a la operación de las embarcaciones.
 - No se mencionan las medidas a tomarse para minimizar el impacto de la erosión y sedimentación que tendrá la ampliación de la carretera de acceso al ferry. Se deberá implementar un plan efectivo que atienda la sedimentación asociada a la construcción, que sea distinto al uso de pacas de heno, y deberá formar parte del proyecto previo a la obtención de un permiso.



- d. Se debe tomar en consideración el acceso a la línea de agua potable. Se debe aclarar cómo se afectaría el funcionamiento de la planta desalinizadora, ya que estarían aumentando la turbidez frente al tubo de entrada del agua a dicho sistema. Debe atenderse ya que podría tener un impacto negativo sobre los residentes de Culebra. Se debería mejorar dicha infraestructura para que no se vean afectadas las operaciones del ferry, ni de otras entidades gubernamentales que operan en el área.
- e. Se deberá proveer un **Plan de Mitigación** detallado que incluya un protocolo de relocalización de las colonias de corales y acciones para minimizar el impacto a las hierbas marinas y la calidad de agua. El anclaje de la embarcación que esté llevando a cabo la reconstrucción no deberá hacerse sobre hierbas marinas. De ser completamente necesario, el proponente deberá mitigar por dicha acción e incluirse en el plan de mitigación.
 - i. Como posible proyecto de mitigación sugerimos la instalación de boyas de anclaje en Culebrita, área donde las hierbas marinas deben ser protegidas de anclaje, particularmente reconociendo el forrajeo intenso por parte de la tortuga verde en esta área.
 - ii. De igual manera, recomendamos el mantenimiento y colocación de boyas de amarre en Culebra y llevar a cabo un proyecto de siembra de mangles como mitigación al área del terminal auxiliar localizado en el área de San Ildefonso.

Para facilitar la evaluación de los documentos requeridos, los mismos deberán ser referidos a la Oficina de Secretaría de nuestro Departamento. Para cualquier información sobre su caso, deberá comunicarse directamente con la Sra. Ana R. Barea Rechani, Directora del Negociado de Permisos, al (787) 999-2200, extensión 2851 o 2815.

Cordialmente,



Nelson Velázquez Reyes
Secretario Auxiliar
Secretaría Auxiliar de Permisos, Endosos y Servicios Especializados

JCD/ARBR/jcd

U.S. Department of Homeland Security
Region II - Caribbean Area Division
P.O. Box 70105
San Juan, Puerto Rico 00936-8105



FEMA

March 24, 2015

Mr. Miguel A. Ríos
Governor's Authorized Representative
Commonwealth of Puerto Rico
P.O. Box 194140
San Juan, PR 00919-4140

Re: National Historic Preservation Act (NHPA)
Section 106 Compliance Review Process
FEMA-4017-DR-PR, Project-0030
Structural Rehabilitation of Culebra's Cargo
Puerto Rico Ports Authority (PRPA)

Dear Mr. Ríos:

On January 13, 2015, we received by email two reports by PRPA regarding the Intensive Archaeological and Historic Survey for the rehabilitation of the Culebra Pier Cargo Ramp at Dewey and rehabilitation of alternate dock at San Ildefonso Cargo Facility.

Based in the process of fulfilling our responsibilities under Section 106 of the NHPA, and after a thorough revision of the submitted information, the Federal Emergency Management Agency (FEMA) has the following comments and recommendations (see enclosures).

We are requesting PRPA to incorporate the suggested changes to the mentioned survey and submit them to us no later than April 15, 2015.

The PRPA must be advised that in accordance with Title 44 of the Code of Federal Regulations (CFR) §206.438(d), if the mitigation measure is not completed on the established date and there is no adequate justification for this non-compliance, no federal funding would be provided for this measure.

Mr. Miguel A. Ríos, GAR
Structural Rehabilitation of Culebra's Cargo
March 24, 2015
Page 4

Should you have any questions or require additional information, please contact Mr. Sonny F. Beauchamp, HMA Coordinator, at (787) 296-3500.

Sincerely,



Alejandro R. De La Campa
Disaster Recovery Manager

c: Mr. Iván R. Orlandi Cabán, Alternate GAR
Mrs. Ingrid Colberg Rodríguez, Executive Director, Ports Authority
Mrs. Carel Velázquez Pola, SHMO

**Hazard Mitigation Grant Program (HMGP) FEMA-4017-DR-PR, Project PR-0030:
Puerto Rico Ports Authority, Reconstruction of the Culebra Terminal Cargo Ramp at
Dewey and construction of alternate dock at San Ildefonso, Culebra, Puerto Rico.**

**NHPA Section 106 compliance review process: comments to the intensive archaeological
and historical survey for the proposed San Ildefonso Cargo Facility, Culebra, two reports
received by email on January 13, 2015.**

*Evaluación Arqueológica Terrestre y Subacuática, Fase IA- IB. Proyecto: "San Ildefonso
Proposed New Cargo Facility, Culebra, PR". Sometido a ATKINS. Presentado por
Arqueología, Inc.: Adalberto Maurás Casillas, Investigador Principal, Autor;
Juan Carlos Acevedo, Investigador, Co-Autor. 28 de octubre de 2014.*

This report is to be included as Appendix A of the *Environmental Assessment for the
Reconstruction of the Culebra Cargo Ferry Terminal*, Prepared by ATKINS for Puerto Rico
Ports Authority, Draft December 2014.

The area of potential effects for the San Ildefonso pier is located inside an archaeological and historical sensitive area. The totality of the peninsula can be considered a historic district that has the potential to present significant remains from at least three different occupations: the Late Cedrosan Saladoid prehistoric occupation as documented in the Lower Camp Site, with radio carbon date A.D. 642 (1350 years ago); the late Spanish Colonial occupation, represented by the town of San Ildefonso (1880-1903); and the U.S.A. Navy occupation represented by Camp Roosevelt (1903 to 1975). The historic district is eligible for inclusion in the National Register of Historic Places (NRHP). There are standing historic structures and there is the potential to encounter archaeological remains of these occupations underneath the floor platforms, sidewalks, pavement areas and roads. Therefore, FEMA initiated a Section 106 consultation process under the National Historic Preservation Act (NHPA) with the State Historic Preservation Office (SHPO). Following are the review comments made by FEMA's Historic Preservation Specialist. Once a revised report is submitted and accepted by FEMA, it will be forward to SHPO for their review and concurrence.

1. Introduction

FEMA submitted this project to the SHPO as part of the NHPA Section 106 consultation process. In response, SHPO concurred with the recommendation that further identification and evaluation efforts were necessary at the San Ildefonso alternate pier's area of potential effect, in order to assess project effects on historic properties. As such, SHPO recommended an intensive survey (archaeological and historical assessment) consistent with the *Secretary of the Interior's Standards and Guidelines on Archaeology and Historic Properties* (SHPO 08-15-14-02 ,dated 08/22/2014). A statement of compliance with the standards and guidelines should be included in the introduction.

It appears as if the FEMA's determination and section 106 consultation letter, as well as SHPO's response was not provided to the archaeologist, as they are not mentioned in the reports. SHPO

requested that the intensive survey work plan be provided for their review and concurrence prior to its implementation. As this step was not taken, it is now requested that a detailed work plan that complies with the objectives of the intensive archaeological and historic survey, as defined in the standard and guidelines, be included in the report. According to the *Secretary of the Interior's Guidelines for Identification*:

“... Intensive survey is most useful when it is necessary to know precisely what historic properties exist in a given area or when information sufficient for later evaluation and treatment decisions is needed on individual historic properties. Intensive survey describes the distribution of properties in an area; determines the number, location and condition of properties actually present within the area; permits classification of individual properties; and records the physical extent of specific properties. An intensive survey should document:

1. The kinds of properties looked for;
2. The boundaries of the area surveyed;
3. The method of survey, including an estimate of the extent of survey coverage;
4. A record of the precise location of all properties identified; and
5. Information on the appearance, significance, integrity and boundaries of each property....”

2/3. Project Description and Area of potential effects

The area of potential effects needs to be clearly defined and identified in the graphics. The conceptual drawing for the San Ildefonso parking layout and access road improvements presented in the archaeological survey (Figures 1 and 2) is not the same as the one presented in the Draft Environmental Assessment (DEA) Figures 5 and 17. This is an important issue as the project is located inside a significant historic district eligible for inclusion in the National Register and has implications for the area to be covered by the intensive archaeological survey. The scope of work for the field methodology and testing was prepared to address only 10 feet widening of the access road on its west side for a length of 365 feet (on page 10 the narrative indicates widening of 7 meters on the west side). The DEA points out that the modifications to the upland area “...include the widening of the existing access to the required width with a loop lane that will allow an uninterrupted flow of traffic and the creation of approximately 30 parking spaces”. Figures 5 and 17 of DEA show the widening of the existing road to accommodate two traffic lanes; 9 parallel parking spaces on the east side (about 10 feet wide and 300 feet long); a parking lot for 24 cars on west side (about 50 feet wide and 300 feet long); and road improvements up to the intersection with the access road for USFWS facilities, for a total length of 500 feet. It also appears that the northeast limit of the existing parking area in front of the pier will be extended to the north. A new road to access a building on the west side of the road is also portrait (building constructed sometime between 2006 and 2013).

It is required that an accurate conceptual parking and access road improvement drawing is included in the report, in order to properly define the area of potential effects to be considered for the intensive archaeological and historic survey.

5/7. Prehistoric background/Previous archaeology reports

In Figure 4, the location of Lower Camp Site (IC-9) (CU-0100010) is misplaced and the site of San Ildefonso and Camp Roosevelt (IC-13) (CU-0100011) is not indicated.

The prehistoric background section includes a general summary of the prehistory of Puerto Rico (pages 16-22). However, this section does not include a discussion about the prehistoric archaeology of Culebra. The report only includes a list of reported sites on page 23. There is no discussion of the types of prehistoric sites, their location, occupations represented or findings reported for Culebra. The results and findings of previous archaeological reports are not integrated into the discussion. Particularly, there is no discussion of the Lower Camp Site, located in the peninsula just 125 meters east of the project area. The narrative and discussion of the historic context and potential archaeology does not take into consideration the Late Cedrosan Saladoid prehistoric occupation of the peninsula – with radio carbon dates A.D. 642 (1350 years ago), as reported in the Lower Camp Site data recovery investigations (Oliver 1992). This information is relevant to the prehistoric occupation of the peninsula and the potential archaeology of the project area, and needs to be addressed in the discussion.

There is a new building on the west side of the road constructed sometime between 2006 and 2013. Was there any archaeological survey conducted for this construction?

3/10a. Historic background and historic cartography review

The report includes a section in the historic background of the peninsula, covering the late Spanish colonial occupation by the town of San Ildefonso from 1880-1903 and the US Navy Camp Roosevelt occupation during the first three quarters of the 20th century. A number of very useful historic maps and sketches are presented. The section on historic cartographic review provides a chronological sequence of historic maps and sketches of the peninsula, with an overlay of the proposed area of potential effects. However, the report does not demonstrate how this valuable information was used in the design of the field methodology. It is recommended that the report includes a map of expected archaeology as a justification for the field testing and documentation design and methodology. For example, if the access road was built by the Navy as early as 1906, it can be expected that it sealed remains of the previous San Ildefonso occupation or even prehistoric remains.

The investigators should also consider referring to the 1944 “Map of the U.S. Naval Reservation in Culebra Is., P.R., showing conditions on June 30, 1944”. It is included in Martínez Garayalde report, where she indicates the historic structures still standing in 2002. It depicts the US Navy facilities at this time, including the pier and boat ramps still standing today, the access road with the same configuration as today, and the existing facilities on both sides of the road (stonewall sidewalk, buildings, etc.).

Martínez Garayalde, Marisol, 2002. Proyecto Rehabilitación a la planta de tratamiento de agua por osmosis reversible en la isla municipio de Culebra (Planta Desalinizadora). Evaluación Arqueológica Fase IA, Revisada. Autoridad de Acueductos y Alcantarillados.

8/9c. Field methodology and results of survey

The field design and methodology must address the area of potential effects, as it needs to be clarified (see item 2/3 above), and must be adequate to the archaeological sensitivity of the project area. It is not justified that the subsurface testing was detained due to the presence of utility lines. The excavations could have been moved to an area outside of the impact from the utility trench, which the report indicates was only 27 cm wide and 50 cm deep. It is recommended that an as built plan of the project area, with existing utilities, be provided to the investigators. Also suggest the use of a small excavator, rather than a digger, for better control of the excavation.

The area of potential effects merits further subsurface testing. At this time FEMA will request that a sketch with the location of the excavations be submitted for review before implementation. The field testing should be directed to the expected archaeology, as observed in the historic cartographic documentation available. For example, since the road is assumed to be in existence since at least 1906, placing a test unit at the edge of the asphalt could determine if there are previous road surfaces, structures, archaeological remains or intact soils underneath the road.

9b. Standing historic structures

The report presents photos of the standing historic structures in the area of potential effects and indicates they all correspond to the Camp Roosevelt or Culebra Naval Reservation occupation. The location of the historic standing structures in the area of potential effects needs to be plotted in an overlay to the project conceptual layout, to determine which ones could be affected by the construction project. For example:

- If the area of potential effects extends to the east side of the access road, will the historic sidewalk and stone wall be affected?
- The drainage canal, where it is located, will it be affected?
- The existing bulkhead, the conceptual drawing indicates it will be reconstructed, will it be affected?
- The wall of the west ramp (figure 37), will it sustain the weight of the traffic and cargo vehicles?

The historic structures need to be briefly described in terms of probable date of construction, construction materials and methodology, use or re-use, modifications, and potential contribution to the historic context they belong to and to the historic district in general. This description is required for any historic structure that will be impacted by the project construction activities, the L-shaped pier, the navy pier, bulkhead and boat ramps; and the access road and any structures along it (sidewalks, drainage ditches, stonewalls, etc.).

As indicated above (see item 3/10a), the investigators should consider referring to the 1944 "Map of the U.S. Naval Reservation in Culebra Is., P.R., showing conditions on June 30, 1944".

10. Conclusions and recommendations - NRHP Eligibility criteria

The report concludes that: the port facilities are testimony of the integrity of the physical and cultural landscape of the former navy reservation; the project is located inside an area with archaeological sensitivity; the perimeter or footprint of the occupation, terrestrial and marine, can be classified as a cultural district; and the district is eligible for inclusion in the National Register of Historic Places under Criteria A, B, C, and D.

The investigators have to explain the significance and eligibility of the historic district in terms of the three historic contexts represented. The eligibility should be justified under each criterion individually. Please refer to the NPS guidelines available at:
<http://www.nps.gov/nr/publications/bulletins/nrb15/Index.htm>

At the end, the investigator recommends archaeological monitoring of the excavation activities on land. We do not support this recommendation at this time. As indicated in item 8/9a above, we understand the area needs further evaluation before making a determination. The historic properties inside the area of potential effects must be evaluated according to the parameters of an intensive survey, consistent with the *Secretary of the Interior's Standards and Guidelines on Archaeology and Historic Properties*

11. References

References should follow the citation style indicated in the Guidelines for preparing an environmental assessment for FEMA.

12. Other comments

In the PDF version of the report received by email, some of the pictures were displaced and are not visible, or covered the text (pages 48-49, 59-62).

Attachment 1. Underwater archaeology survey

Evaluación Arqueológica Subacuática Fase IA-IB, para el Proyecto "San Ildefonso Proposed New Cargo Facility", Culebra, P.R. by Richard Fontáñez Aldea, Arqueólogo Subacuático e Historiador Marítimo, Agosto 2014.

The underwater archaeology evaluation covered an area of 300 feet long by 122 feet wide, project area as indicated in the proposed layout plan for the auxiliary cargo ferry terminal at San Ildefonso (ATKINS). The methodology implemented for the underwater archaeology survey provides an adequate evaluation of the proposed project area.

1.1. Muelle San Ildefonso: the bulkhead and sunken pier (pages 22-26; 41-43)

The archaeologist indicates they do not have a construction date for the "L" shaped concrete dock, which according to historic cartographic data already existed in the 1944 Navy Map.

The interpretations about the previous docks, changes of the wharf area, and changes in the coastline should be revised using the historic cartography available: 1887 map, 1897 map, 1903 sketch, 1906 map, and 1944 station site plan. The configuration in the 1944 plan is similar to the one observed in the 1964 aerial photo.

The proposed project includes the reconstruction of the existing bulkhead in the west side, where the new dock will be attached to the wharf. An evaluation of this historic structure, as part of the historic district, should be provided (included existing dock and submerged section; bulkhead and boat ramps) – as indicated in the review of the terrestrial archaeology report.

1.2. Recommendation of underwater archaeology

1. Conduct archaeological monitoring during the installation of the steel piles and in the case that the following activities are planned: dredging, modification of the coast line, modification of the bulkhead or the removal of the section of the “L” shaped dock that is submerged.
2. Establish a 100-foot wide buffer zone between the construction area and the shipwreck on the east side. If the buffer zone cannot be established, a Phase II archaeological evaluation is recommended.
3. Recommend a phase IB survey for the designated turning area, as this area was not included in this evaluation and the ferry propeller washer can cause damage to the marine floor and impact cultural resources.

We recommend that the investigator reviews these recommendations in accordance with the revised scope of work presented by ATKINS since this survey was undertaken.

Draft environmental Assessment (December 2014)

The comments about cultural resources (section 5.5; summary table 5.7; section 6.2) should be considered tentative until the review of the archaeological report is completed and approved by FEMA and SHPO. Section 7.2: should include correspondence and comments from SHPO.

The archaeology reports most comply with SHPO’s request for an intensive survey (archaeological and historic assessment). A list of comments is provided. The subsurface testing conducted in the upland area of potential effects is not adequate. It is necessary to know precisely what historic properties are inside the project area. Each of the historic properties identified in the area of potential effects needs to be evaluated in order to accurately determine any effects on historic properties.

Prepared by:
Marisol J. Meléndez Maíz
EHP Historic Preservation Specialist
FEMA, Region 2, Caribbean Area Division
March 10, 2015



FEMA

March 17, 2015

Mr. Miguel A. Ríos
Governor's Authorized Representative
Commonwealth of Puerto Rico
P.O. Box 194140
San Juan, PR 00919-4140

Re: Hazard Mitigation Grant Program
FEMA-4017-DR-PR, Project-0030
Structural Rehabilitation of Culebra's Cargo Pier
Puerto Rico Ports Authority (PRPA)

Dear Mr. Ríos:

On March 02, 2015, we received a letter from the United States Fish and Wildlife Service (USFWS) with comments regarding the submission of the Environmental Assessment (EA) and Endangered Species Consultation for the rehabilitation of the above mentioned project.

Based on the submitted information by PRPA to the Federal Emergency Management Agency (FEMA), the USFWS has the following comments and recommendations:

1. The EA does not mention other possible uses for the auxiliary cargo facilities.
2. Based on the Fish and Wildlife Coordination Act, the following comments and recommendations are that Federal agencies' are responsible to address and consider direct, indirect, and cumulative impacts in the National Environmental Policy Act (NEPA) process as established in the Council of Environmental (CEQ) Regulations for Implementing the Procedural provisions of the NEPA (40 CFR §1500-1508). Thus, the USFWS believes that the project may have indirect and cumulative impacts on wetland resources along the road that connects the facility to the town of Dewey. This road runs adjacent to mangrove wetlands and Ensenada Honda Bay at various locations.

Currently, this road is used primarily for routine vehicular traffic and is not subject to daily cargo traffic. Any widening or improvements to the road to facilitate the increased use of cargo traffic, could impact the adjacent mangroves and marine ecosystems. The EA's discussion on traffic focuses on traffic volume and congestion, but does not address whether the existing road can support the increased traffic without modification or impacting adjacent wetlands.

3. In an effort to minimize impacts due to sediment resuspension, the proposed auxiliary cargo dock was extended into deeper water. The project drawing should reflect that the end of the pier is now in the 19-20 foot depth contour.
4. The EA estimates impacts to the marine ecosystems based only on the structural footprint of the dock (.08 acres) and not on the project site limits as shown in the various project drawings. It states that impacts will be limited to pile placement and shading by the pier and considers the future colonization of the concrete piles by marine organisms to be sufficient compensatory mitigation. The USFWS recommends that limits of the project site be used to calculate the project impact.

Also, the EA states that during ferry operations water turbidity may increase during docking and undocking. This could cause additional indirect impacts to adjacent marine ecosystems. Since this facility will continue to be used after the main cargo pier is repaired, impacts will continue throughout the life of the project. The Applicant should consider additional mitigation opportunities to compensate for these long term project impacts.

The Endangered Species Act (ESA) Section 7 Consultation indicates the following:

1. Page 13 of ESA Consultation; the species list does not include the Virgin Island (VI) tree boa (*Epicrates monensis granti*). This species is currently known from this site and adjacent lands.
2. Page 48, VI tree boa, Section 5.3.3, Current Range. This species is classified as a subspecies of the Mona Island boa (*Epicrates monensis*) and not the Puerto Rico boa (*E. inornatus*) as stated in this section.
3. Page 48, VI tree boa. The proposed upland work at San Idelfonso will include road widening, clearing of vegetation for parking, and other work. This section concludes that the VI boa is not expected to be found in the project area. However, personal communications with U.S. Fish and Wildlife Service Refuge staff of Culebra indicates that the San Idelfonso area is known to harbor VI boas. Therefore, the USFWS does not agree with your determination that the project will not affect the VI tree boa.

4. The USFWS recommends that for the VI tree boa, the upland area be evaluated using the protocols developed in the USVI for determining boa habitat. Boa habitat suitability for the upland areas to be impacted should be established and reported to the USFWS. Once construction starts, conservation measures to minimize boa impacts during construction should be implemented (see enclosures). The USFWS believes that the implementation of these measures would result in a "*may affect but is not likely to adversely affect*" determination for the species.
5. With regard to the Antillean manatee, the applicant has provided conservation measures to be implemented during construction. Based on the habitat characteristics and these measures, the USFWS concurs with the determination that the project is not likely to adversely affect these species.
6. With regard to the roseate tern, the USFWS concurs with the determination that there is no effect to the species by this project.

Based on the comments of the USFWS, we are requesting PRPA to perform the suggested changes to the EA and evaluate the project area using the protocols developed in the USVI for determining the VI tree boa habitat and present these mentioned changes to FEMA.

In addition, we expected to receive comments from the National Oceanic Atmospheric Administration / National Marine & Fisheries Services (NOAA/NMFS). Nevertheless, after a thorough revision and analysis of these comments by the USFWS, we understand that the project has significant impact on ESA resources that we recommend discussing in our next meeting to be held on March 19, 2015.

The Puerto Rico Ports Authority must be advised that in accordance with Title 44 of the Code of Federal Regulations (CFR) §206.438(d), if the mitigation measure is not completed on the established date and there is no adequate justification for this non-compliance, no federal funding would be provided for this measure.

Mr. Miguel A. Ríos, GAR
Structural Rehabilitation of Culebra's Cargo Pier
March 17, 2015
Page 4

Should you have any questions or require additional information, please contact Mr. Sonny F. Beauchamp, HMA Coordinator, at (787) 296-3500.

Sincerely,



Alejandro R. De La Campa
Disaster Recovery Manager

c: Mr. Iván R. Orlandi Cabán, Alternate GAR
Mrs. Ingrid Colberg Rodríguez, Executive Director, Ports Authority
Mrs. Carel Velázquez Pola, SHMO



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Caribbean Ecological Services
Field Office
P.O. Box 491
Boqueron, PR 00622

MAR 02 2015

In Reply Refer To:
FWS/R4/CESFO/72049-028

Mr. Alejandro De La Campa
Disaster Recovery Officer
FEMA
PO Box 70105
San Juan, Puerto Rico 00936-8105

Re: HGMP FEMA-DR4017-PR,
Rehabilitation of Culebra Cargo and
Passenger Pier, Culebra Island, Puerto Rico

Dear Mr. De La Campa:

This is in reply to your February 5, 2015 letter, providing copies of the Environmental Assessment (EA) and Endangered Species Consultation for the rehabilitation of the marine facilities in the Municipality of Culebra Island. Our comments are issued in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the Endangered Species Act (16 U.S.C. 1531 et seq. as amended).

FEMA will be providing a Hazard Mitigation Grant for this project. The Puerto Rico Ports Authority has proposed the project in two phases. First a new auxiliary cargo facility will be constructed in the San Idelfonso area and cargo operations will be transferred to that facility temporarily. The new facilities consist of a floating dock; parking, road improvement and other features. Once the existing cargo pier in Ensenada Honda is repaired, operations will return to that site. The facilities in San Idelfonso will be kept as auxiliary docking facilities in the event of inclement weather, or other emergency issues. Other possible uses for the auxiliary cargo facilities are not discussed in the EA.

Based on the information provided and available to us in the file, we have the following comments and recommendations:

Fish and Wildlife Coordination Act

- 1) Federal agencies' responsibility to address and consider direct, indirect, and cumulative impacts in the NEPA process was established in the Council of Environmental (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR §§1500-1508). We believe that

the project may have indirect and cumulative impacts on wetland resources along the road that connects the facility to the town of Dewey. This road runs adjacent to mangrove wetlands and Ensenada Honda Bay at various locations. Currently this road is used primarily for routine vehicular traffic and is not subject to daily cargo traffic. Any widening or improvements to the road to facilitate the increased use by cargo traffic, could impact the adjacent mangroves and marine ecosystems. The EA's discussion on traffic focuses on traffic volume and congestion, but does not address whether the existing road can support the increased traffic without modification or impacting adjacent wetlands.

- 2) In an effort to minimize impacts due to sediment resuspension, the proposed auxiliary cargo dock was extended into deeper water. The project drawings should reflect that the end of the pier is now in the 19-20 foot depth contour.
- 3) The EA estimates impacts to the marine ecosystems based only on the structural footprint of the dock (.08 acres) and not on the project site limits as shown in the various project drawings. It states that impacts will be limited to pile placement and shading by the pier and considers the future colonization of the concrete piles by marine organisms to be sufficient compensatory mitigation. We recommend that the limits of the project site be used to calculate the project impacts.

Also, the EA states that during ferry operations water turbidity may increase during docking and undocking. This could cause additional indirect impacts to adjacent marine ecosystems. Since this facility will continue to be used after the main cargo pier is repaired, impacts will continue throughout the life of the project. The applicant should consider additional mitigation opportunities to compensate for these long term project impacts.

Endangered Species Act Section 7 Consultation

- 1) Page 13 of ESA Consultation; the species list does not include the Virgin Island (VI) tree boa (*Epicrates monensis granti*). This species is currently known from this site and adjacent lands.
- 2) Page 48, VI tree boa, Section 5.3.3, Current Range. This species is classified as a subspecies of the Mona Island boa (*Epicrates monensis*) and not the Puerto Rico boa (*E. inornatus*) as stated in this section.
- 3) Page 48, VI tree boa. The proposed upland work at San Idelfonso will include road widening, clearing of vegetation for parking, and other work. This section concludes that the VI boa is not expected to be found in the project area. However, personal communication with U.S. Fish and Wildlife Service Refuge staff on Culebra indicate that the San Idelfonso area is known to harbor VI boas. Therefore we do not agree with your determination that the project will not affect the VI tree boa.

- 4) We recommend that for the VI tree boa, the upland area be evaluated using the protocols developed in the USVI for determining boa habitat. Boa habitat suitability for the upland areas to be impacted should be established and reported to the Service. Once construction starts, conservation measures to minimize boa impacts during construction should be implemented (see enclosures). The Service believes that the implementation of these measures would result in a “may affect but is not likely to adversely affect” determination for the species.
- 5) With regards to the Antillean manatee, the applicant has provided conservation measures to be implemented during construction. Based on the habitat characteristics and these measures, we concur with the determination that the project is not likely to adversely affect this species.
- 6) With regards to the roseate tern, we concur with the determination that there is no effect to the species by this project.

Thank you for the opportunity to comment on these documents, if you have any questions please contact Felix Lopez of my staff at 787 851-7297 x 210.

Sincerely,



Edwin E. Muñoz
Field Supervisor

fhl
encl (2)
cc:
COE, San Juan
DNER, San Juan
Mr. José Ayala, FEMA
FWS, Culebra
PRPB, San Juan (CZ-2015-1120-050)

Culebra Cargo Ferry VI boa Conservation Measures

The endangered Virgin Island tree boa, commonly known as VI boa or “Culebrón de la Sabana” is a small, nocturnal, arboreal non-venomous native snake of PR and USVI. The juveniles are a light grey with black blotches, and change to adult coloration as they mature. The body in adults is a light brown, with chestnut blotches edged in black. They may grow to become 41 inches in length. VI boas are found on Culebra Island and on a few offshore cays. They generally live in xeric (dry) habitat, which is characterized by poor rocky soils, in scrub woodland or subtropical dry forest with high density of interdigitating branches and vines connecting adjacent tree canopies. The VI boa can be found crawling in vegetation at night. They can be found also in areas of disturbed vegetation, and may use lower vegetation and artificial structures to travel from one patch to another. In daytime they are usually found under rocks or logs.

The following conservation measures should be developed and implemented to minimize any possible adverse effects to the species. Although surveys did to detect this species was not found, we recommend the following precautions to prevent impact to any boa which may have been missed or not been present during the survey.

1. A pre-construction meeting should be conducted to inform supervisors and employees about the conservation of protected species, as well as penalties for harassing or harming such species. All personnel involved in site clearing and site construction must be informed of the potential presence of the snake, and the importance of protecting the snakes. A biologist should be on site during the initial earthwork or debris removal, to ensure safe removal of any snakes found during these activities.
2. Prior to any use of machinery on the site, the vegetation should be cleared by hand to provide time to the boa, if present, to be detected or move away from the area. All personnel involved in site clearing must be informed of the potential presence of the snake, and the importance of protecting the snakes.
3. Before activities commence each workday during the vegetation clearing phase, the experienced personal in identifying and searching for boas should survey the areas to be cleared that day, to ensure that no boas are present or affected within the work area. If boas are found within the working area, activities should stop at the area where the boas are found until the boas move out of the area on their own. Activities at other work sites, where no boas have been found after surveying the area, may continue. If relocation of the species is necessary, any relocated boas should be transferred by authorized personnel of the Department of Natural and Environmental Resources (DNER) to appropriate habitat close to the project site. Any findings should be reported to the Service and to the DNER Ranger office in Culebra so they can further

assist you in developing sound conservation measures and specific recommendations to avoid, minimize and/or compensate for any impacts to this species. Debris should be removed immediately off site to avoid snakes hiding in crevices.

4. Strict measures should be established to minimize boa casualties by motor vehicles or other construction equipment. Before operating or moving equipment and vehicles in staging areas near potential boa habitats (within 25 meters of potential boa habitat), these should be thoroughly inspected to ensure that no boas are lodged in the standing equipment or vehicles. If boas are found within vehicles or equipment, authorized personnel of DNER must be notified immediately for proper handling and relocation. Any relocated boas should be transferred to appropriate habitat close to the project site.
5. If boas are found within the working area, activities should stop at the area where the boas are found until the boas move out of the area on their own. Construction and activities at other work sites, where no boas have been found may continue. If relocate the species is necessary, any relocated boas should be transferred by authorized personnel of DNER to appropriate habitat close to the project site. Any findings should be reported to the Service and to the Department of Natural Resources Ranger office.

We recommend that the above mentioned conservation measures should be incorporate into the project plans. If you have any question regarding the comments above, please contact Carlos Pacheco from our staff at (787) 851-7297 extension 229.

Tree Boa Habitat Survey March 2006



Habitat characteristic surveys are to be conducted following the prescribed methodology. Boa habitat will be determined from survey results using criteria such as size and locations of habitat clumps, connectivity, refugia density, and prey base. Upon habitat determination, the proposed development plans are subject to alteration to protect the most valuable ecological habitat on site.

The survey methodology to be followed is outlined below. A “habitat clump” is defined as a minimum of three or more trees each having branches greater than 1 cm in diameter approaching within 20 cm of equivalent sized branches of adjacent trees at an elevation greater than 1.5 m above the ground. Interdigitating branches have an inclination angle of less than 30 degrees from horizontal. Vines greater than 1 cm in diameter connecting adjacent tree canopies would also classify a canopy as interdigitating. Clumps should contain, but are not limited to, trees with minimum 10 cm dbh.

1. All trees ≥ 10 cm dbh must be mapped.
2. Vegetation communities should be identified and mapped. Vegetation community descriptions are available from the DPNR/Division of Fish and Wildlife (DFW).
3. All habitat clumps on the applicant’s property containing interdigitating vegetation must be measured and mapped. Habitat clumps are to be measured by the diameter of the vegetation drip-lines of that clump. If a habitat clump extends onto an adjacent property, the total size, including the portion on the neighboring property shall be estimated.
4. Percentage of interdigitation of canopy within clump can be measured using crown densitometry or other method applied consistently across clumps.
5. Distances between a habitat clump and its nearest habitat clump will be measured, regardless of presence or absence of connecting corridor.

6. All features connecting clumps must be identified and mapped as habitat corridors. These features may consist of narrow continuous canopy with the all the criteria of habitat clumps except number of trees, e.g., limb size, height, distance, and inclination; vegetated habitat structures such as chain-link fencing with vines; lines of shrubs; rock walls; or other features connecting two or more habitat clumps that provide sufficient structure for movement and cover of boas.
7. Relative prey base density will be determined by number of arboreal lizards observed per unit of time per m². Surveys are conducted along a set-distance transect for a set amount of time. Lizard surveys should be conducted repeatedly over a period of several days to minimize weather effects, with multiple surveys averaged for each clump. Prey base should be determined separately for each habitat clump.
8. Arboreal and terrestrial refugia must be mapped. Refugia are defined as follows: inactive termite nests over 50 cm in diameter with crevices wider than 2 cm and probed depths greater than 20 cm, tree holes with 2 cm or larger diameter and a probed depth of 20 cm, bromeliads over 50 cm in diameter, rock piles with crevices 2 cm in width with a probed depth of 20 cm, and ground spider holes with a probed depth of 20 cm. Where refugia are too numerous to map, density within a subsample of the clump should be determined.

DFW requests the information be presented in a detailed report identifying the primary habitats for tree boas, which shall also be represented in map format, showing locations of trees (no. 1), delineation of habitat communities (no. 2), delineation of clumps of interdigitating canopy (no. 3), movement corridors (no. 5), and locations of refugia (no. 7). The habitat clumps shall be numbered on the map, and a corresponding table shall provide information as to distances between clumps (no. 4), prey density (no. 6), and any additional information. The map shall also show topographic contours. Habitat clumps shall be ranked based on a combination of characteristics, as follows.

Habitat Ranking Criteria

Each area within the site defined as a distinct habitat clump, as defined above, is to be surveyed according to survey protocols. The following scores will be assigned for each criterion for each clump. Each clump will have a score between 0 and 7. In order to be considered as a viable habitat clump for tree boas, it must have a score greater than zero in each of the first three categories (vegetation community, clump size, and interdigitation). The maximum score for a clump with a maximum score for each criterion is 7. The habitat is not considered to be a viable “clump” if it does not score greater than 0 in each of the first three categories. The scores can also be used to identify clumps in need of restoration or enhancement effort, as necessary.

Criteria	Score
Vegetation Community	
Vegetation in clump is dry forest, woodland, mangrove, mixed dry shrubland, thicket/scrub, or a mixture of all	1
Vegetation does not consist of above communities	0
Habitat Clump Size	
Intact habitat is ≥ 0.3 ha	1
Intact habitat is < 0.3 ha but is connected to another habitat clump with a corridor	0.5
Intact habitat is < 0.3 ha	0
Interdigitation	
Canopy is 100 % interdigitated	1
Canopy is 75-99 % interdigitated	0.5
Canopy is < 75 % interdigitated	0
Connectivity	
Habitat clump is within 100 m of next intact habitat clump, with a connecting corridor linking the clumps	1
Habitat clump is within 100 m of next intact habitat clump, without a connecting corridor	0.5
Habitat clump is not within 100 m of next intact clump	0
Prey Density	
Number of <i>Anolis</i> lizards observed per unit time per unit area in relation to other habitat clumps. Each clump is ranked according to number of <i>Anolis</i> observed, and the rank divided by the number of clumps surveyed (e.g., if three clumps surveyed, the clump with the most lizards scores $3/3 = 1$, the clump with the next most lizards scores $2/3 = 0.66$, the clump with the least amount scores $1/3 = 0.33$).	0-1
Refugia Density	
Number of refugia per ha in relation to other habitat clumps surveyed. Each clump is ranked according to number of refugia recorded, and the rank divided by the number of clumps surveyed (e.g., if three clumps surveyed, the clump with the most refugia scores $3/3 = 1$, the clump with the next most refugia scores $2/3 = 0.66$, the clump with the least amount scores $1/3 = 0.33$).	0-1
Trees	
Number of trees with dbh ≥ 10 cm in habitat clump is highest in relation to other habitat clumps surveyed. Each clump is ranked according to number of trees recorded, and the rank divided by the number of clumps surveyed (e.g., if three clumps surveyed, the clump with the most trees scores $3/3 = 1$, the clump with the next most trees scores $2/3 = 0.66$, the clump with the least amount scores $1/3 = 0.33$).	0-1

Standardized Herpetofaunal Survey Protocol

The standard method for conducting herpetofaunal surveys is Visual Encounter Survey (VES; Crump and Scott 1994). Surveyors walk a measured transect through an area searching for specimens on the ground, among leaf litter, on shrubs and trees, and in the canopy. Sampling effort is measured by the amount of time spent searching multiplied by number of people conducting the search (person-hours), and divided by the amount of area searched (e.g., person-hours per hectare).

Relative abundance is determined by number of observations per unit effort (person-hours per hectare) surveyed. Results of multiple survey events are averaged and presented as average relative abundance and one standard deviation.

Reference:

Crump, M. L. and N. J. Scott, Jr. 1994. Visual encounter surveys. Pages 84-92 *in*: Heyer, W. R., M. A. Donnelly, R. W. McDiarmid, L. C. Hayek, and M. S. Foster, editors. *Measuring and Monitoring Biological Diversity: standard methods for amphibians*. Smithsonian Institution Press, Washington, D.C.





United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard
Atlanta, Georgia 30345

In Reply Refer To:
FWS/R4/RF/Area II/059035

JAN - 5 2015

The Honorable Alejandro J. García-Padilla
Governor of the Commonwealth of Puerto Rico
San Juan, Puerto Rico 00902-0082

Dear Governor García-Padilla:

Thank you for your letter dated October 23, 2014, on behalf of the Commonwealth of Puerto Rico, requesting a modification to land restrictions on a portion of approximately 0.79 acres and 0.34 acres of right-of-way of the total parcel area located at San Ildefonso Ward in Culebra Island, Puerto Rico.

The proposed project would be located in Tract 1k (map enclosed) which comprises approximately 109.48 of the 935.98 acres released and quitclaimed to the Commonwealth of Puerto Rico. These lands, as stated in a Quitclaim Deed document, are subject to reservations, exceptions, restrictions, conditions, and covenants. These lands were mutually agreed by both the Department of the Interior and the Commonwealth of Puerto Rico, in accordance with a Cooperative Management Agreement signed in 1982, for the conservation and development of the natural and cultural resources (including wildlife and associated habitats with particular emphasis on threatened and endangered species) on lands conveyed to the Commonwealth and the U.S. Fish and Wildlife Service (Service) on the island of Culebra.

According to the 1973 Joint Report entitled: "Culebra: A Plan for Conservation and Development," prepared and submitted by the Secretary of the Interior and the Governor of Puerto Rico, the optimum use of the littoral areas around the perimeter of Culebra, except for areas designated as wildlife refuge, is for public recreation with only minimal facilities provided.

According to the information provided, your request is based on the need to temporarily fulfill cargo and passenger ferry operation requirements while conducting reconstruction work on the ramp used for vessels operated by the Puerto Rico Maritime Transportation Authority. The vessels transport passengers and cargo between the main island of Puerto Rico and the Municipality of Culebra. The proposed project would include a floating pier and parking area. Your letter states that all other possibilities have been evaluated by the Puerto Rico Ports Authority and this site was identified as the only place that could serve the cargo needs while carrying out the reconstruction work. In addition, these facilities would remain as a spare port facility if the main ferry ramp became damaged or inoperable in the future.

After reviewing your request and consulting with Susan Silander, Project Leader, Caribbean Islands National Wildlife Refuge Complex, we have the following comments. These comments are issued in accordance with the Fish and Wildlife Coordination Act (FWCA: 48 Stat. 401, as amended; 16 U.S.C. 661 *et seq*) and the Endangered Species Act (ESA:16 U.S.C. 1531 *et seq.*, as amended).

The Service's Caribbean Ecological Services Field Office has provided technical assistance to Federal Emergency Management Agency (FEMA) several times regarding Culebra Island's Ferry Terminal Cargo. On September 20, 2012, the Service concurred with an effect determination conducted by FEMA for the Antillean manatee under Section 7 (a)(2) of the Endangered Species Act (ESA). The project consisted of the partial reconstruction of the existing cargo platform located at the Dewey Ward in Culebra. The project did not require the dredging of sea grass beds. To minimize potential impacts to manatees during construction, the Service recommended the implementation of conservation measures for the manatee. The Service concurred with FEMA's determination that the project was not likely to adversely affect the manatee and consultation concluded.

In May 2014, the Service was invited to a meeting for the discussion of the plan to relocate the cargo operations to Ensenada Honda, San Ildefonso Ward. The Service participated in the meeting and provided comments in writing on June 16, 2014. The Service referenced information provided by National Oceanic and Atmospheric Administration (NOAA) Fisheries during the meeting showing that the area is covered by sea grass beds and is relatively shallow for the construction and operation of the cargo ferry facilities. The Service recommended the development of a detailed mitigation plan for all components of the project to adequately compensate for all impacts to sea grasses. Since the project is federally funded, the Service recommended the development of a National Environmental Policy Act (NEPA) compliance document with the discussion of all project impacts, both temporary and permanent impacts, and the impacts of any widening of improvements to the existing access road. We also recommended the evaluation of alternatives, including the use of existing facilities (e.g., existing Navy ramp) to minimize effects to seagrasses.

With regards to the federally-listed species, the Antillean manatee has been reported inside Ensenada Honda Bay. We recommended that FEMA initiate consultation under Section 7(a)(2) for possible effects to the species and its habitat during construction and operation of the proposed facilities. We recommended that FEMA develop minimization measures to minimize possible effects to the species and its habitat. To date, the Service has not received a response to the letter.

The Service does not object to a modification of the Quitclaim Deed restrictions of a portion of approximately of 0.79 acres and 0.34 acres of right-of-way; however, we continue to recommend that all project effects to both land and water resources be appropriately evaluated, and adequately compensated. In accordance with our Plan for Conservation and Development and Cooperative Management Agreement, consultation and compliance with other Commonwealth and Federal concerned agencies is required. Since the project will be developed with Federal funds and permits, compliance with NEPA and ESA is needed.

In addition, Service boat docking and launching facilities are located close to the proposed project location as per a Cooperative Agreement signed in 1991 between the Service and the Culebra Conservation and Development Authority. Any construction/operation, including parking for the proposed facility, needs to take into consideration Service access to this area.

If you have any further concerns, please feel free to contact me at (404) 679-4000, or Susan Silander, Project Leader, Caribbean Islands National Wildlife Refuge Complex, at (787) 851-7258, x 306.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Cynthia K. Dohner". The signature is fluid and cursive, with the first name being the most prominent.

Cynthia K. Dohner
Regional Director

Enclosure



REPLY TO
ATTENTION OF

DEPARTMENT OF DEFENSE
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
ANTILLES OFFICE
400 FERNANDEZ JUNCOS AVENUE
SAN JUAN, PUERTO RICO 00901-3299

December 11, 2014



Regulatory Division
North Permits Branch
Antilles Permits Section
SAJ-2002-01425 (SP-JMS)

Mr. Romel Pedraza
Puerto Rico Ports Authority
P.O. Box 362829
San Juan, PR 00936

Dear Mr. Pedraza:

Reference is made to the Department of the Army (DA) permit application submitted through the Joint Permit Application (JPA) Number 1397 on behalf of the Puerto Rico Port Authority. The project entails the discharge of fill material into the waters of the United States associated with the reconstruction and repair of the cargo platform of Culebra Ferry Terminal in Sardinera Bay and the construction of an Auxiliary Cargo Ferry Terminal at San Idelfonso in Ensenada Honda. The proposed project would be located south of PR-252 at the Culebra Ferry Terminal (Lat. 18.3013° and Lon. -65.3025°) and south of PR-250 at the San Idelfonso Terminal (Lat. 18.3063° and Lon. -65.2836°) in the Municipality of Culebra, Puerto Rico. Please refer to case number SAJ-2002-001425 (IP-JMS) in future correspondence regarding this project.

While this application originated through the JPA Process with the Commonwealth of Puerto Rico, insufficient information was received by the U.S. Army Corps of Engineers (Corps) to fully evaluate your proposal. Therefore, in order to proceed with the permit evaluation process, please furnish this office the information requested below, items 1.0 through 2.3. Other information, items 2.4 through 3.8, could be addressed at this time to assist in expediting the review of your application.

1.0. Description and Narratives:

1.1. Provide a more detailed description of the project or proposed activity, the purpose of the project and the need for the project. Please include the extent of proposed impacts, describe the proposed impacts (both temporary and permanent) to the jurisdictional areas. In that regard, we request a breakdown of the acreage and linear impacts proposed on Waters of the United States (WOTUS), itemized for impacts for each structure and work. The type of impact (fill, dredge, etc.) for each project component must also be specified. For the current site plan, please quantify the extent of impact associated with each of these post-development land use types.

1.2. Provide the proposed schedule for the project or activity.



- 1.3. Provide a list of adjacent property owners, including names and mailing addresses, for distribution of the Public Notice. We request that you provide complete mailing addresses, including zip codes. In addition, please provide the mailing addresses including zip codes for the nearest Public Library and U.S. Post Office. Please ensure all property owners within the unnamed road are included. Also, please provide the list on self-stick mailing labels and in electronic, MS Word or Excel, file.
 - 1.4. Provide a description of the location and dimensions of any adjacent structures to the project site or activity location.
 - 1.5. Provide a listing of all other government authorizations obtained or requested for the work, including required certifications relative to water quality.
 - 1.6. Please provide a statement describing how impacts related to the proposed discharge of fill material in WOTUS are to be avoided and minimized.
 - 1.7. Please provide a statement describing how the impacts to waters of the United States are to be compensated, or explain why compensatory mitigation should not be required for the proposed impacts.
 - 1.8. Please ensure the information provided as a response to this request for additional information is sufficient to answer items 17 through 25 of the Joint Permit Application, Form (ENG 4354).
- 2.0. Figures and Exhibits:
- 2.1. Provide a figure that clearly shows the proposed site plan and adjacent site features, including specific locations and dimensions of existing and proposed structures or activities. Show the total plan of development including existing and future phases depicting the location, and the existing vs. proposed conditions where work would be conducted in WOTUS. The drawings must illustrate the dimensions of the area of WOTUS that would be affected by fill discharge activities and the volume of fill material. The drawings must be relative to the mean high water mark (MHWM).
 - 2.2. Provide a drawing that shows the cross-sectional (elevation) view of the project and impact areas to indicate the relationship to the affected waters. The drawings must be relative to the MHWM. The drawings presented with the JPA do not properly relate the cross sections with the plan view.
 - 2.3. Provide a figure clearly indicating the location and extent of pre-development wetlands and proposed dredge/fill impacts. Include a chart that indicates all structure with the permanent and temporary impacts in acres.
 - 2.4. Other figures and exhibits that could be provided at this time and would benefit you by helping us to expedite the review of your application are as follows:
 - a. Provide a figure that clearly shows existing soil types on the project site.



- b. Provide a figure that depicts the existing vegetative communities and land uses on the project site.
- 3.0. Additional information not needed for issuance of a public notice that could be addressed at this time and would benefit you by helping us to expedite the review of your application are as follows:
- 3.1. Provide a delineation of affected special aquatic sites. Wetland delineations must be prepared in accordance with the 1987 Wetland Delineation Manual and 2008 Caribbean Regional Supplement. Information concerning wetland delineations and jurisdictional data forms can be found at the following internet address:

<http://www.saj.usace.army.mil/Missions/Regulatory/SourceBook.aspx>
 - 3.2. Provide the names of federally listed endangered or threatened species that may be affected by the proposed work or utilize designated critical habitat that may be affected by the proposed work. Please include any work performed (i.e., transect type and coverage, survey date[s] and time[s]) to identify occurrence, or potential occurrence, of potentially affected species or critical habitat. Furthermore, any maps that depict this information can also be included.
 - 3.3. State any historic properties listed in or eligible for listing in, the National Register of Historic Places and state which historic property may be affected by the proposed work. If necessary, please provide a vicinity map that indicates the location of the historic property in relation to the project site.
 - 3.4. Provide any information in reference to the presence or absence of submerged aquatic vegetation or resources, which could be adversely affected by this project. Please include the dates and times of any survey or site review work, and any maps that depict the locations of any submerged aquatic vegetation or resources.
 - 3.5. Provide a description of vegetation cover types and/or land uses on the subject property.
 - 3.6. Provide a discussion of existing site features, hydrologic conditions, and overall wetland conditions, which help define the overall hydrological regime of the project site. Include any information that may illustrate any hydrological dynamics (both positive and/or negative) that may affect the watershed, and how they relate to the project site (i.e. *major drainage canal through a wetland system that falls on the project site, and the effect the canal has on the wetland system and watershed*).
 - 3.7. Forward digital files (via email or compact disk) of the requested text information to expedite processing.
 - 3.8. The proposed impacts must also meet the 404(b)(1) guidelines of the Clean Water Act. Although only a statement concerning avoidance, minimization, and compensatory mitigation is necessary for the issuance of the public



notice, the following detailed information will be needed to assist us in fully evaluating the project. It often expedites the permitting process if this information is submitted at this time.

- a. Avoidance: Your project is considered to be a non-water dependent proposal because it does not have to be located in a wetland to achieve the basic project purpose. For non-water dependent projects, there is a presumption that alternative upland site exist which are available to the applicant. There is also a presumption that fill placed elsewhere, other than wetlands or other aquatic sites will have less adverse impact. The applicant must rebut these presumptions. Please provide a discussion of alternative sites and why this particular site was selected for your project.
- b. Minimization: After the least damaging alternative site is selected or after the applicant successfully rebuts the above avoidance presumptions, the project must be shown to be the least damaging practicable alternative that meets the basic project purpose. Minimization includes alternate site plans and other steps (e.g., site access options) which would reduce impacts to on site wetlands. Please describe other site plans and steps you can take to minimize the impact of your project on wetland resources.
- c. Compensatory Mitigation: You may be required to provide compensatory mitigation for resource losses which are specifically identifiable and reasonably likely to occur. All mitigation proposals cannot be fully evaluated until successfully completing the above avoidance and minimization steps.

Please refer to the attached ENG FROM 4345 checklist to ensure completion of all items, 17 through 25, in the ENG FROM 4345 Joint Permit Application Form submitted.

Please be aware that the proposed project would require a Water Quality Certification from the Puerto Rico Environmental Quality Board.

As the application is considered incomplete, no action will be taken on it until the required information and drawings have been received. We request you provide this information within 30 days. If no response is received, we will assume you have no further interest in obtaining a Department of the Army permit and the application will be withdrawn. Such action will constitute final action by the Department of the Army.

You are cautioned that work performed below the mean high waterline or ordinary high waterline in waters of the United States, or the discharge of dredged or fill material into adjacent wetlands, without a Department of the Army permit could be subject to enforcement action. Receipt of a State permit does not obviate the requirement for obtaining a Department of the Army permit for the work described above prior to commencing work.



Should you have any questions or comments regarding this request for additional information, please contact Mr. Johann M. Sasso, Project Manager, at the letterhead address or by telephone at 787-729-6905.

Sincerely,

A handwritten signature in black ink that reads "S. Castillo".

Sindulfo Castillo

Chief, Antilles Regulatory Section

Copy furnished:
Gabriel Hernández, Metro office Park Lote 8 Calle 1, Suite 102, Guaynabo, PR 00968

Enclosure.

ENG FORM 4345 CHECKLIST

Additional information may be requested depending on site location and site conditions.



- Provide the name, mailing address, and contact information of the applicant, agent, and/or consultant (**Blocks 5 through 10**).
- Applicant's signature if agent or consultant is employed. (**Block 11**)
- Please provide name identifying the proposed project, e.g., Landmark Plaza. (**Block 12**)
- Provide the project's location including but not limited to name of waterbody, municipality, section, township, range, address of work, State Tax Parcel ID, latitude and longitude, and driving directions. (**Blocks 13 through 17**)
- Describe the overall activity. Indicate whether discharge of dredged material or fill material is involved. (**Block 18**)
 - For Docks and Piers please provide the following:
 - Construction methodology (i.e. wood, concrete, floating, etc.)
 - Type of vessel and proposed use (recreational use by applicant, rental, commercial use by applicant, etc.)
 - Number of existing slips (show the location of each slip on the project drawings as well)
 - For excavation/dredging activity(ies) provide the following:
 - Description, dimension, and location to be excavated/dredged (open water, existing channel, etc.)
 - Method of excavation/dredging (hydraulic, clamshell, barge-mounted crane, etc.)
 - Description, dimensions, and location of disposal site
 - For Shoreline Stabilization please provide the following:
 - Type of fill material to be used (i.e. concrete, wood, rock, etc.)
 - Construction methodology (type of equipment, from land or by barge, etc.)
 - Volume of backfill, if applicable
- State the purpose and need for the project; describe the intended use of the proposed activity. (**Block 19**)
- For Fill and Excavation Activities provide the following (**Blocks 20 through 22**):
 - Describe the area to be filled; i.e. wetlands or open water and give dimension in square feet or acres
 - Describe the quantity of fill material to be used in cubic yards
 - Describe the type and composition of the fill material and its source (i.e. rock, sand, clay, concrete, etc.)
 - Describe any temporary construction and access fills that may be required
- Provide a statement to show how the proposed impacts to waters of the U.S. (i.e. wetlands, surface waters, etc.) have been avoided, minimized, and compensated; or a brief description of why you believe mitigation is not required (**Block 23**)
- If work has begun or has been completed please provide a brief description of the completed activities. (**Block 24**)
- Provide the names and mailing addresses of the Adjoining Property Owners, Lessees, etc. whose property adjoins the project site or who may be affected by the proposed activity. (**Block 25**)
- Indicate if you have applied for or received authorization from other federal, state, or local agencies for the project. (**Block 26**)
- Provide the signature of the applicant or authorized party. (**Block 27**)

Drawing and Illustration Information:

- Provide location map indicating site location and boundaries.
- Provide overlay of site conditions (i.e. wetlands and/or surface waters) with the proposed activity
- Provide separate plan view and cross-sectional drawings for existing and proposed site conditions.
- Provide black and white legible plan view drawings on 8 1/2" X 11" sized paper to include:
 - North arrow
 - Dimensions of existing and proposed activity(ies)
 - Total plan of development
 - Indicate the location of cross-sectional views
 - Dimensions of site conditions to include the location of waters of the U.S.
- Provide black and white legible cross-sectional drawings on 8 1/2" X 11" sized paper to include:
 - Dimensions of proposed work
 - Indicate the mean/ordinary high water line and mean/ordinary low water line for project adjacent to waters of the U.S.

Supplemental Drawing Information:

- For In-Water Activities:
 - Indicate the height above the mean high water line, especially for docks or other in-water structures
 - Indicate the length of shoreline
 - Indicate the location of any vegetation along the shoreline and in-water resources (i.e. seagrasses, oysters, coral)
 - Volume of dredge material noted on the drawing if applicable
 - Existing and proposed water depths if dredging is proposed
 - Distance to any Federal Channel and width of waterway
- For Fill or Excavation Activities:
 - Label area to be filled and/or excavated in acres or square feet
 - Distances of proposed activities to avoided resources.

In-Water Activities Checklist

Additional information may be requested depending on site location and site conditions.



Application Information:

- Indicate if the proposed activity (ies) occurs in, on, or over wetlands or surface waters. (*Part 1 of Joint Permit Application*)
- Provide name address and contact information of the applicant, agent, and consultant. (*Part 3 of Joint Permit Application*)
- Provide total applicant-owned land contiguous to the project. (*Part 4 of Joint Permit Application*)
- Is the project part of a multi-phase project? (*Part 4 of Joint Permit Application*)
- What is the total area of work or structures in, on, or over other surface waters? (*Part 4 of Joint Permit Application*)
- If dredging activity(ies) are proposed, provide the total volume of material to be dredged. (*Part 4 of Joint Permit Application*)
- Provide number of new wet and dry boat or watercraft slips. (*Part 4 of Joint Permit Application*)
- Provide the project's location including but not limited to county, section, township, range, address of work, property control number, and driving directions. (*Part 5 of Joint Permit Application*)
- State the purpose of the project; describe the intended use and dimensions of the activity(ies) proposed. (*Part 6 of Joint Permit Application*)
- For Docks and Piers please provide the following: (*Part 6 of Joint Permit Application*)
 - Type of vessel and proposed use (recreational use by applicant, rental, commercial use by applicant, etc.)
 - Number of existing slips (show the location of each slip on the project drawings as well)
- For Dredging Activity(ies) provide the following: (*Part 6 of Joint Permit Application*)
 - Describe the area to be dredged (open water, existing channel, etc.)
 - Method of dredging (hydraulic, clamshell, barge-mounted crane, etc.)
 - Description, dimensions, and location of disposal site
- For Shoreline Stabilization please provide the following: (*Part 6 of Joint Permit Application*)
 - Type of material to be used (i.e. concrete, wood, rock, etc.)
 - Construction methodology (type of equipment, from land or by barge, etc.)
 - Amount of backfill, if applicable
- Document in text and with drawings how impacts to wetlands and surface waters have been avoided and minimized. (*Part 6 of Joint Permit Application*)
- Provide a statement to show how the proposed impacts will be offset. (*Part 6 of Joint Permit Application*)
- Provide details on any pre-application meetings with regulatory staff and any previous actions taken by any regulatory agency. (*Part 7 (a) (b) of Joint Permit Application*)
- Provide names and addresses for the owners of properties adjacent to the site. (*Part 7 (c) of Joint Permit Application*)

Supplemental Information:

- Provide location map indicating site location and boundaries.
- Provide separate plan view and cross-sectional drawings for existing and proposed site conditions.
- Provide black and white legible cross-sectional drawings on 8 1/2" x 11" sized paper to include:
 - Dimensions of proposed work
 - Dimensions of site conditions to include the location of wetlands and surface waters.
 - Indicate the mean high water line and mean low water line for projects adjacent to tidal waters and the ordinary high water line for projects adjacent to non-tidal waters.
 - Indicate the height above the mean high water line, especially for docks or other in-water structures
 - Indicate the location of any vegetation along the shoreline and in-water resources
 - Volume of dredge material noted, if applicable
 - Existing and proposed water depths
- Provide black and white legible plan view drawings on 8 1/2" x 11" sized paper to include:
 - North arrow
 - Dimensions of existing and proposed activity(ies) including the length of the shoreline
 - Total plan of development (other activities planned on-site within the next five years)
 - Indicate the location of cross-sectional views
 - Distance to any Federal Channel and width of waterway

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
U. S. Coast Guard Sector San Juan

5 Calle La Puntilla
San Juan, PR 00901
Phone: (787) 729-2376
Fax: (787) 729-2377
Email: d07-dg-secsj-facilities@uscg.mil

16600
P 436-14
October 27, 2014

Therese W. McMillan
Acting Administrator
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Ms. McMillan,

The Puerto Rico Ports Authority has requested that I write an opinion on the Culebra pier project which FTA may provide funding for. Among my responsibilities as the Captain of the Port for Puerto Rico and the U.S. Virgin Islands, I am responsible for the safety and security of maritime facilities and waterways management projects. Further, I am invested in ensuring the integrity and continuity of the maritime transportation system, including the recovery of this system after a disruptive event like a natural disaster. In keeping with these responsibilities, I firmly believe that the proposed San Ildefonso Auxiliary Terminal not only will be an asset to the life and economy of Culebra, but also will be a critical component to ensuring that there is an alternate means for vessels to deliver fuel, food, goods and passengers to the island.

The only other existing port facility sizeable enough to handle commercial vessel traffic (that includes a cargo ramp to accommodate vehicular traffic) in Culebra is located in Bahia de Sardinias, an open harbor that receives heavy winds and waves due to the prevailing weather patterns in the area. In the past, hurricanes have extensively damaged the Bahia de Sardinias facility for weeks at a time, disrupting commerce, commuters and tourism (Culebra's main source of income). The absence of a suitable alternate cargo vessel dock to receive basic habitation services for this island is both a safety and security concern for me. Ensenada Honda is a very well protected harbor which assists in minimizing heavy weather impact on pier structures. Additionally, the Coast Guard maintains the federal navigation aids in this area including ten navigation buoys, an outer range channel marker and an inner range channel marker.

As you are likely aware, the physical limitations of the airport on Culebra are such that the supply chain that provides services to the island must heavily rely on uninterrupted maritime transportation. As such, I unequivocally endorse this project that will provide Culebra with an alternative marine terminal facility in Ensenada Honda.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. W. Warren".

R. W. WARREN
Captain, U. S. Coast Guard
Captain of the Port



ESTADO LIBRE ASOCIADO DE
PUERTO RICO

Oficina Estatal de Conservación Histórica
State Historic Preservation Office

August 22, 2014

Alejandro R. De La Campa
Disaster Recovery Manager
U.S. Dept. of Homeland Security
FEMA
Region II – Caribbean Area Division
P.O. Box 70105
San Juan, PR 00936-8105

26 AUG 14 PM 01:48 FEMA

**SHPO 08-15-14-02 RECONSTRUCTION OF THE CULEBRA TERMINAL
CARGO RAMP AND CONSTRUCTION OF ALTERNATE PIER AT SAN
ILDEFONSO, CULEBRA, PUERTO RICO / FEMA-4017-DR-PR, HMGP
PROJECT PR-0030**

Dear mister De La Campa:

Our Office received correspondence on August 15, 2014 regarding the above referenced project. We concur with your recommendation that further identification and evaluation efforts are necessary at the San Ildefonso location in order to assess project effects on historic properties. The Secretary of the Interior's Standards and Guidelines on Archeology and Historic Preservation provide standards and guidelines regarding identification and evaluation of historic properties. Consistent with these standards and guidelines we recommend that an **intensive survey** (identified in your letter as an **archaeological and historical** assessment) be carried out within the San Ildefonso pier's area of potential effects.

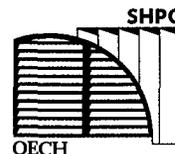
Please provide us with an intensive survey work plan for review and concurrence prior to its implementation.

If you have any questions regarding this matter, please contact Miguel Bonini at (787) 721-3737 or mbonini@prshpo.gobierno.pr.

Sincerely,

Diana López Sotomayor, Archaeologist
State Historic Preservation Officer

DLS/NPT/BRS/MB



U.S. Department of
Homeland Security

United States
Coast Guard



Commander
U.S. Coast Guard Sector San Juan
Prevention Department

5 Calle La Puntilla
San Juan, PR 00901
Phone: (787) 729-2041
Fax: (787) 729-2377

16705
P 355-14
August 15, 2014

Puerto Rico Ports Authority
Attn: Victor Suarez Melendez
PO Box 362829
San Juan, PR 00936-2829

Dear Mr. Suarez:

This letter is in reply to your correspondence dated August 13, 2014 regarding the alternate cargo pier and facilities to be built at the San Ildefonso Sector in Ensenada Honda Bay. After a comprehensive review of your proposal for the conceptual pier design and suitability of the navigable waterway, my office has no objections to this project. Your agency shall ensure that the construction, and later operations of the floating barge dock, do not impede or pose a risk to the safe navigation of the surrounding commercial and recreational boating community.

Furthermore, I encourage your agency to communicate with my staff from the Facility Inspections Division prior to starting operations to ensure that your new facility is in full compliance with the Maritime Transportation Security Act (MTSA). Should you have any questions concerning this letter, you may contact Lieutenant Commander Jose Perez at (787) 691-7058 or at Jose.A.Perez3@uscg.mil.

Sincerely,

A handwritten signature in blue ink that reads "K. J. Benson".

K. J. BENSON
Commander, U. S. Coast Guard
Chief, Prevention Department
By direction

August 13, 2014

ATKINS Caribe, LLP
Metro Office Park
Lot 8 1st Street Suite 102
Guaynabo, PR 00968-1717

To who it may concern:

**AAA-RE-14-25-0005; CULEBRA -REHABILITATION OF CULEBRA'S CARGO RAMP
PUERTO RICO PORTS AUTHORITY
STATE ROAD PR-251 INTERSECCTION PR-251, PLAYA SARDINAS WARD
PRE-CONSULTATION**

On August 1st, 2014, your office issued a letter to the Puerto Rico Aqueduct and Sewer Authority (PRASA) with a request of information and comments to a proposed rehabilitation project for the Culebra's main cargo ramp. As part of the intended works, you are proposing the construction of a temporary ramp at Ensenada Honda (San Ildefonso Site) that will serve as a cargo ramp during the rehabilitation project (time frame of approximately six months).

The equivalent units to be assigned to the project will be based on the preliminary drawings or the expected water demand established on the design. PRASA reserves the right to modify the assigned units if there is any difference encountered from the original proposal.

In that area, PRASA maintains a raw sea water pump station that serves our Reverse Osmosis Treatment Plant. The characteristics and the functionality of the facility were discussed in a field meeting performed on August 8, 2014. Our mayor concerns are as follow:

1. The natural characteristics and quality of water that could be disturbed by the cargo ships docked on the temporary ramp, including contamination by oil, fuel or other harmful substances.
2. The disturbance of the seabed that will provoke obstruction of the screens or suction pit.
3. The access restriction to the facility, as established by federal laws.

The undergoing design process should consider protective and mitigation structures in order to maintain the optimal operation of the pump station and the quality of the water to be processed in our plant. The proposed alternatives will be discussed, evaluated and approved by PRASA.

August 13, 2014

Page 2 of 2

The water service for the project could be provided by performing a connection to our aqueduct line located at the municipal access road (exit line from our reversed osmosis water plant).

The sanitary sewer cannot be provided by PRASA, since there are no sewer lines at the vicinity of the project. The owner needs to submit a proposal for the sewer water treatment and final disposal to the Puerto Rico Environmental Agency (Junta de Calidad Ambiental).

This is not a letter of endorsement, the owner is responsible to submit the proposed project to the Permit Office (OGPe) as the established by law 2009-161.

If you have any questions or concerns, don't hesitate in contacting us by phone at (787) 744-7795 Ext. 4086 or by e-mail luis.gonzalez@acueductospr.com.

Cordially,



Luis R. González Delgado, P.E.
Technical Manager - East Region

U.S. Department of Homeland Security
Region II - Caribbean Area Division
P.O. Box 70105
San Juan, Puerto Rico 00936-8105



FEMA

August 11, 2014

Ms. Diana López Sotomayor, Archaeologist
Executive Director
State Historic Preservation Office
P.O. Box 9023935
San Juan, PR 00902-3935

RE: NHPA Section 106 Determination
FEMA-4017-DR-PR, HMGP Project PR-0030
Puerto Rico Ports Authority: Reconstruction of the Culebra Terminal Cargo Ramp
and Construction of Alternate Pier at San Ildefonso, Culebra, Puerto Rico

Dear Archaeologist López:

The Puerto Rico Ports Authority has applied for financial assistance from the U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), to reconstruct the Culebra Ferry Terminal Cargo Platform, located in Dewey, Culebra, Puerto Rico. FEMA is proposing to fund the project through the Hazard Mitigation Grant Program (HMGP) under the Presidential disaster declaration FEMA 4017-DR-PR for Hurricane Irene, of August 27, 2011. The HMGP is authorized under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

All goods and services arrive to the island of Culebra by cargo ferries or airplanes. The cargo platform of the Culebra Ferry terminal at Sardinias Bay is deteriorated due to wave action. The proposed undertaking will prevent a failure of the platform that can leave the Culebra residents without this crucial service. The existing cargo platform was constructed in 1988. The cargo ramp consists of a reinforced concrete slab 12" thick, placed on top of reinforced concrete beams supported by 40' long HP 14X73 series steel piles in plumb and batter configuration.

The reconstruction of the Sardinias Bay Cargo Ramp is estimated to take 8 months. To maintain the operations during construction, the Ports Authority proposes to habilitate an alternate cargo pier at San Ildefonso, Ensenada Honda Bay, at the wharf previously used by the Department of Natural and Environmental Resources (DNER). The proposed project at San Ildefonso includes the reconstruction or rehabilitation of the existing pier facilities, construction of parking facilities and improvements to the access road. A barge will be anchored and fixed away from the existing dock and a steel ramp will be used as a connection between the barge and the reconstructed dock.

Ms. Diana López Sotomayor, Executive Director
NHPA Section 106 Determination
FEMA-4017-DR-PR, HMGP Project PR-0030
Puerto Rico Ports Authority: Reconstruction of the Culebra Terminal Cargo Ramp
and Construction of Alternate Pier at San Ildefonso, Culebra, Puerto Rico
August 11, 2014
Page 2

FEMA has conducted an evaluation of the area of potential effects (APE) for the San Ildefonso pier construction project (see enclosure). The APE is located inside an archaeological sensitive area. The totality of the peninsula can be considered a historic district that has the potential to present significant remains from at least three different occupations: the Late Cedrosan Saladoid prehistoric occupation as documented in the Lower Camp Site, with radio carbon date A.D. 642 (1350 years ago); the late Spanish Colonial occupation, represented by the town of San Ildefonso (1880-1903); and the U.S.A. Navy occupation represented by Camp Roosevelt (1903 to 1975). The historic district is eligible for inclusion in the National Register of Historic Places (NRHP). There is the potential to encounter archaeological remains of these occupations underneath the floor platforms, sidewalks, pavement areas and roads. The actual configuration of the pier at San Ildefonso is the same as the one depicted in the Map of U.S. Naval Reservation in Culebra, dated June 30, 1944. The Ensenada Honda Bay has been the scenario of navigation and trading activities for hundreds of years and there is the potential to encounter underwater archaeological resources.

FEMA finds that the scope of work for the construction of the San Ildefonso cargo pier and its related activities has the potential to affect historic properties and is initiating consulting with PR-SHPO as required under 36CFR800. In order to resolve this potential adverse effect, FEMA recommends that an **archaeological and historical assessment** be conducted for all the areas of potential effects (APE) on land and underwater.

FEMA appreciates your continued cooperation in the review of federally funded projects. Should you have any questions or require additional information, please contact Mr. José E. Ayala, Environmental Specialist, at (787) 296-3500 or by email at Jose.Ayala3@fema.dhs.gov.

Sincerely,



Alejandro R. De La Campa
Disaster Recovery Manager

Enclosure

MJMM

NHPA Section 106 Determination, Archaeological/Historical Review

Hazard Mitigation Grant Program (HMGP) FEMA-4017-DR-PR, Project PR-0030
Reconstruction of the Culebra Terminal Cargo Ramp at Dewey; and construction of new
alternate – permanent dock at San Ildefonso, Culebra, Puerto Rico

Project description:

The Puerto Rico Ports Authority has applied for financial assistance from the U.S. Department of Homeland Security, Federal Emergency Management Agency (FEMA), to reconstruct the Culebra Ferry Terminal Cargo Platform, located in Dewey, Culebra, Puerto Rico. FEMA is proposing to fund the project through the Hazard Mitigation Grant Program (HMGP) under the Presidential disaster declaration FEMA 4017-DR-PR for Hurricane Irene, of August 27, 2011. The HMGP is authorized under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

The reconstruction of the Dewey, Sardinias Bay Cargo Ramp is estimated to take 8 months. To maintain the operations during construction, the Ports Authority proposes to habilitate an alternate cargo pier at San Ildefonso, Ensenada Honda Bay, at the wharf previously used by the Department of Natural and Environmental Resources (DNER).

Location and resource:

The proposed project to reconstruct the Culebra Terminal Cargo Ramp has been modified to include **two separate locations**:

1. The full rehabilitation of the existing cargo ramp at **Dewey**, Sardinias Bay, (coordinates 18.301509, -65.302641) including the removal of old piles and installation of new HP piles, is within the footprint of the existing facilities and has no potential to affect historic properties.
2. The construction of an alternate (permanent) dock at **San Ildefonso**, Ensenada Honda, (coordinates 18.306272, -65.823611), to be utilized during the reconstruction of the existing cargo ramp. The San Ildefonso project is within an area of reported historic and archaeological resources from at least three different occupation periods.

Existing conditions:

The existing Culebra cargo platform at Sardinias Bay, built in 1988, is considerably deteriorated and needs to be replaced. The cargo ramp consists of a reinforced concrete slab 12” thick, placed on top of reinforced concrete beams. Pile foundations consist of HP 14 x 73 x 40’ steel piles in plumb and batter configuration. This cargo ramp represents the only entry point for goods and services to the island. Its reconstruction requires the relocation of the cargo operations to an alternate pier during the estimated 8 month construction period.

The small existing pier at San Ildefonso, Ensenada Honda, needs to be modified and improved to handle the cargo operations during the reconstruction of the Sardinias Bay cargo platform. The configuration and proportions of the existing pier at San Ildefonso are the same as the 1944 Map of U.S. Naval Reservation in Culebra. The San Ildefonso pier has two existing boat ramps, located at either side of the 145 feet long bulkhead. The pier is about 50 feet wide. The Puerto

Rico Aqueduct and Sewer Authority (PRASA) intake for the Culebra water desalinization plant is located at the center of the dock. The existing platform measures some 45 x 20 feet.

Proposed undertaking at the San Ildefonso pier:

The proposed construction project for the new alternate dock at San Ildefonso is still in its planning stages and the design plan has not been finalized. An Environmental Assessment will be conducted by the applicant in order to determine final design decisions.

The proposed scope of work for the San Ildefonso pier construction will include a large variety of tasks:

- 1) Construction of new access and parking facilities: 24 meter parking spaces, 24 car holding spaces, 5 passenger bus spaces, drop off areas, etc.
- 2) Reconstruction of the access road from the pier to road PR-250, approximately 400 meters long.
- 3) Rehabilitation of existing pier and facilities (area of about 50 x 50 meters):
 - a) new bulkhead 50' long;
 - b) new 8" concrete slab (1922 SF);
 - c) asphalt or concrete area 6664SF for cargo and vehicular lanes;
 - d) 6'6" perimeter fence (105 FTS) with 32'0" gate;
 - e) 42" perimeter guardrails (217 FTS)
 - f) Platform to be demolished and reconstructed (845 SF)
 - g) New aluminum boarding/de-boarding ramp 15' long
 - h) Reinforced concrete floating pontoon 30' x 50', anchored by four to six concrete anchor piles
 - i) Ramp from floating pontoon to the pier (865 SF)
 - j) ADA portable restroom trailer
 - k) Ticket booth
 - l) New covered passenger drop-off area
 - m) Passenger holding area (3653 SF)
 - n) new roof for existing structure (864 FTS)
- 4) Underwater work
 - a) Installation of a new bulkhead 50' long.
 - b) Installation of four to six concrete piles needed to anchor the floating pontoon.
 - c) A bathymetric survey will be conducted to determine if it is necessary to dredge the navigation channel and turning basin for the cargo ferry.
 - d) Additional buoy placement and anchorage to mark the navigation channel.
 - e) Activities related to the compensatory mitigation of impacts to endangered species, critical habitats, sea grass beds, mangroves.
- 5) Evaluation of the capacity of road PR-250 and bridges to handle the traffic generated by the relocation of the cargo pier to San Ildefonso.

Area of Potential Effects (APE):

The area of potential effects for the San Ildefonso pier is located inside an archaeological and historical sensitive area. The totality of the peninsula can be considered a historic district that has the potential to present significant remains from at least three different occupations.

The San Ildefonso alternate pier is a complicated construction project with diverse areas of potential effects, including land and underwater areas. The areas of potential effects can be described as: the pier and facilities construction area; the new parking area and improved access road to PR-250; the underwater work in front of the pier for installation of new bulk head and piles; possible underwater work for the placement of buoy anchorage along navigation channel in Ensenada Bay; possible underwater work to dredge the navigation channel and turning basin for the cargo ferry; possible underwater work in areas to be determined for activities related to mitigation of impacts to endangered species, sea grass beds, critical habitats, etc.; and location of the project staging area during construction.

Besides the area of potential effects for this project, consideration should be given to the future effects that the construction of a permanent pier and the improvements to the access road and parking facilities could have in attracting future development to the San Ildefonso area. It is necessary to carefully consider the impacts of the proposed project, not just on individual elements or features of the district and their immediate area, but on the district as a whole.

Archaeology:

The area of potential effects for the San Ildefonso pier is located inside an archaeological and historical sensitive area. The totality of the peninsula can be considered a historic district that has the potential to present significant remains from at least three different occupations: the Late Cedrosan Saladoid prehistoric occupation as documented in the Lower Camp Site, with radio carbon date A.D. 642 (1350 years ago); the late Spanish Colonial occupation, represented by the town of San Ildefonso (1880-1903); and the U.S.A. Navy occupation represented by Camp Roosevelt (1903 to 1975). The historic district is eligible for inclusion in the National Register of Historic Places (NRHP). There is the potential to encounter archaeological remains of these occupations underneath the floor platforms, sidewalks, pavement areas and roads.

The archaeological excavations at Lower Camp Site (Oliver1992) uncovered an undisturbed midden, which yielded an unusually rich cached of faunal remains and a sizable quantity of artifacts made from different materials (ceramics, shell, stone, and coral). Two hearths were documented underneath the midden, suggesting a change in function from food processing to refuse area. The deposit may have been related to a domestic unit. The excavations also recovered historic artifacts.

The documentary and cartographic description for the late 19th century town of San Ildefonso de La Culebra indicates it was organized into a regular grid pattern with six east-west streets and five north-south streets. The town centered on the public plaza, and it had a church, a government house, a public dock, and a large public water tank. By 1894, 24 houses had been constructed in the town. Most of the town buildings were described as being constructed from locally available wood and covered with wooden shingles or straw thatch. The cemetery was located north of the town's center. In 1898 San Ildefonso had an area of 18 hectares. The 1902 and 1903 descriptions of town San Ildefonso make reference to the town public buildings like a catholic church built in 1890, a police station, two schoolhouses built in 1892, a tiny wharf, several streets and 62 houses of fair construction (Navy Report 1902; AGS 1903). During the

1985 archaeological survey, stone walls and artifact midden scattered throughout the peninsula were reported (Thomas 1985).

The US Navy established Camp Roosevelt in the center of San Ildefonso in 1903. The town's inhabitants were relocated to a narrow strip of mangrove swamp at Dewey, Sardinias Bay. Many of the late 19th century wooden buildings and some masonry buildings were destroyed by the Navy. Between 1904 and 1906, the Navy built a number of permanent masonry buildings. Facilities included barracks hospital, ice house, commissary store, marine barracks, wash house-bakery, guard house-canteen-reading room, commanding officer's office, blacksmith shop, quartermaster's store house, stable, oil house, store shack, boar shed and carpenter's shop, bath house, search light house, cistern, two cisterns (from Spanish town), existing wharf, proposed wharf, etc. The Navy modified the docking facilities in 1936. The actual configuration of the pier at San Ildefonso is the same as the one depicted in the Map of U.S. Naval Reservation, Culebra, P.R., dated June 30, 1944.

The Ensenada Honda Bay has been the scenario of navigation and trading activities for hundreds of years. There is the potential to encounter underwater archaeological resources during the replacement of the bulkhead and installation of concrete piles to secure the floating pontoon. If it is necessary to dredge the navigation channel and turning basin for the cargo ferry, underwater archaeological reconnaissance is needed. The navigation channel and buoy anchorage placement has the potential to present underwater archaeological resources and remains of sunken boats.

Standing Structures:

The area of potential effects includes a number of historic standing structures, remains of the San Ildefonso town and the Camp Roosevelt facilities. The access road from the pier to road 250 appears to follow the same alignment as the road in the 1994 Navy map. There are a number of historic structures located along this road: stonewall, sidewalks, stone storehouses, cisterns, etc. The pier at San Ildefonso has the same configuration and dimensions as the pier in the 1944 Navy map, with a bulkhead 145 feet long, two boat ramps and a platform projection from the center of the pier. The addition of the intake for the PRASA desalinization plant appears to be the main alteration to the historic pier.

Findings:

The area of potential effects for the San Ildefonso pier is located inside an archaeological/historical sensitive area. The totality of the peninsula can be considered a historic district that is eligible for inclusion in the NRHP. The historic district has the potential to present significant remains from at least three different occupations: the Late Cedrosan Saladoid prehistoric occupation (AD 650); the town of San Ildefonso (1880-1903); and Camp Roosevelt, U.S. Navy (1903 to 1975). There is the potential to encounter archaeological remains of these occupations underneath the floor platforms, sidewalks, pavement areas and roads.

The pier at San Ildefonso has the same configuration and dimensions as the pier in the 1944 Navy map and is a contributing element to the historic district. A section of the pier will be affected by the proposed project.

The Ensenada Honda Bay has been the scenario of navigation and trading activities for hundreds of years. There is the potential to encounter underwater archaeological resources.

FEMA findings are that the scope of work for the construction of the San Ildefonso cargo pier and its related activities have the potential to affect historic properties and has initiated consulting with PR-SHPO as required under 36CFR800. In order to resolve this potential adverse effect, FEMA recommends that an **archaeological and historical assessment** be conducted for all the areas of potential effects (APE) on land and underwater.

The land archaeological and historical assessment should include the following:

(1) archival and cartographic research directed at the specific cultural context of the project area and the three possible periods of occupation (including underwater); (2) interviews with local informants; (3) intensive systematic surface reconnaissance, with mapping of visible structural remains and artifacts refuse areas; (4) present a statement of what type of resources can be expected and their location – expected archaeology; (5) selection of areas for exploratory excavations, with reference to expected archaeology; (6) exploratory excavations to determine the integrity of archaeological resources; (7) documentation of features, remains and structures identified; (8) classification of artifacts; (9) analysis of the results: determination of integrity, research potential; (10) presentation of written report, with pertinent photos, maps and drawings. The underwater archaeological and historical assessment should also include: reconnaissance of areas to be impacted by construction new bulkhead and installation of concrete piles; and any other area to be impacted once the project draft design is available.

References:

- Annual Report of Navy Department for the Year 1902. Report of the Secretary of the Navy. Miscellaneous Reports. Congressional Edition, Volume 4455, pp. 975-979 (<http://books.google.com>).
- Haeselbarth, A.C., 1903. Culebra Island. *Bulletin of the American Geographical Society* (AGS), Vol. 35, No. 2, pp. 125-130 (<http://www.jstor.org/stable/198753>).
- Map of U.S. Naval Reservation, Culebra Is., P.R., showing conditions on June 30, 1944 (copy in Martínez Garayalde 2002)
- Martínez Garayalde, Marisol, 2002. Proyecto Rehabilitación a la planta de tratamiento de agua por osmosis reversible en la isla municipio de Culebra (Planta Desalinizadora). Evaluación Arqueológica Fase IA, Revisada. Autoridad de Acueductos y Alcantarillados.
- Oliver, José R., 1992. Results of the Archaeological Testing and Data Recovery Investigations at the Lower Camp Site, Culebra Island National Wildlife Refuge, Puerto Rico. Garrow & Associates, Inc.
- Sketch map. Plan view of the town of San Ildefonso (1881-1902) and U.S. Navy Installations (1902) (copy in Oliver 1992).
- Thomas, Ronald A., 1985. A Stage IA Culture Resource Survey: Culebra Wastewater Facilities Project, Culebra Island, Puerto Rico. MAAR Associates Inc., Newark, Delaware.
- U.S.F.W.S. Section 106 Consultation Letter to PR-SHPO dated August 10, 2006, for the proposed Administrative Office, Culebra, (1344-square foot building), within the footprint of the Refugee's former Office and staff quarters (copy on file at PR-SHPO).

Maps:

1881. Emplazamiento del pueblo de San Ildefonso.
1902. Sketch map of Navy facilities in San Ildefonso
1944. Map of Navy facilities in San Ildefonso

Interested parties to be contacted:

- Fundación de Culebra, Inc. (Museo Histórico de Culebra)
- Autoridad de Conservación y Desarrollo de Culebra
- USFWS – Culebra National Wildlife Refugee

Prepared by:

Marisol J. Meléndez Maíz
Historic Preservation Specialist
FEMA Region 2, CAD
July 16, 2014



Figure 1. General location of the San Ildefonso pier, north shore of Ensenada Honda, Culebra



Figure 2. Present conditions at the San Ildefonso pier.



Figure 4. San Ildefonso pier, section of the existing bulkhead to be reconstructed.
PRASA desalinization plant water intake on the right side.

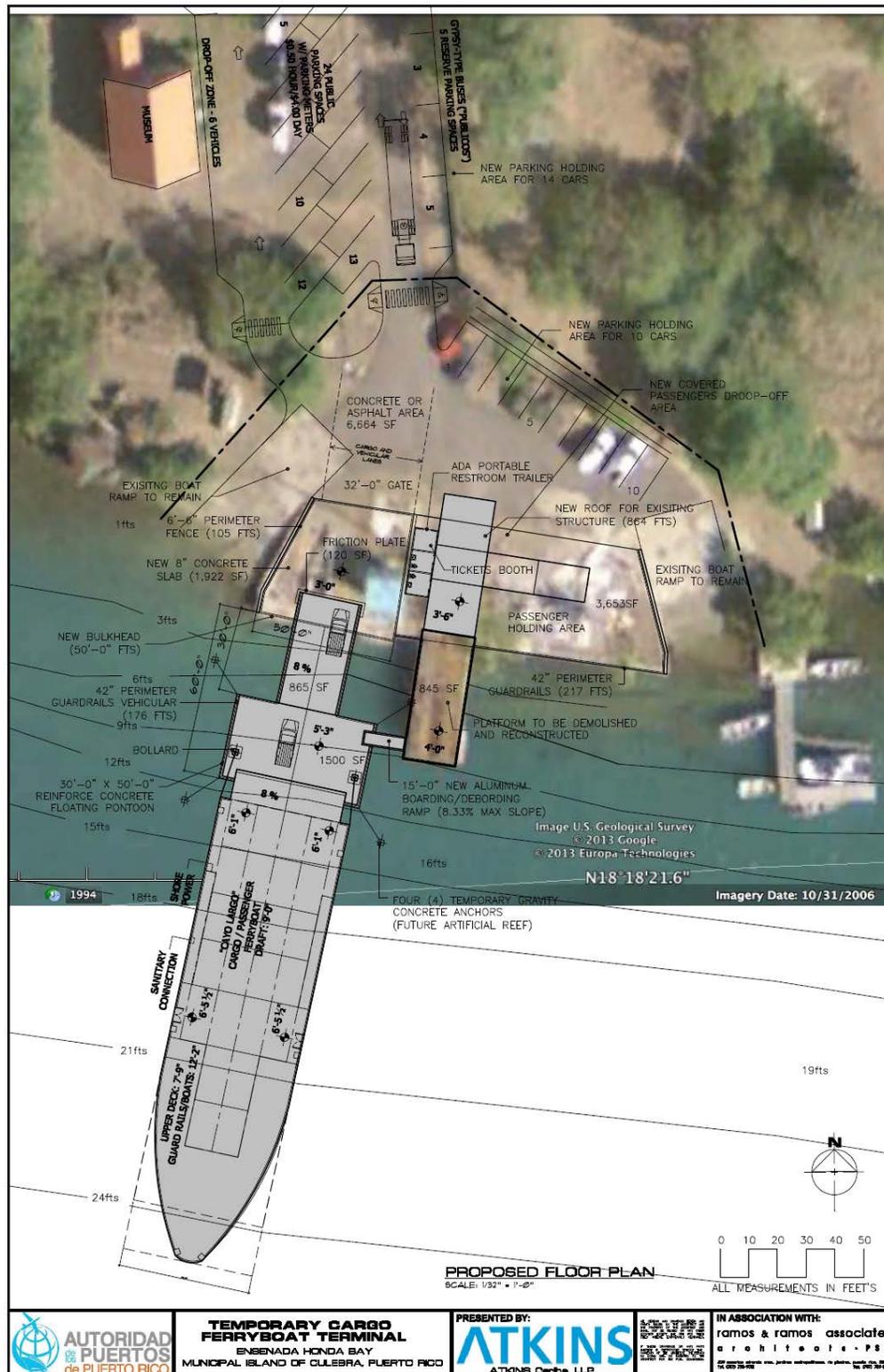


Figure 5. Proposed facilities and improvements for the San Ildefonso pier.
 Design will also include improvements of the access road to PR-205.



Figure 6. Plan for the town of San Ildefonso in 1881.

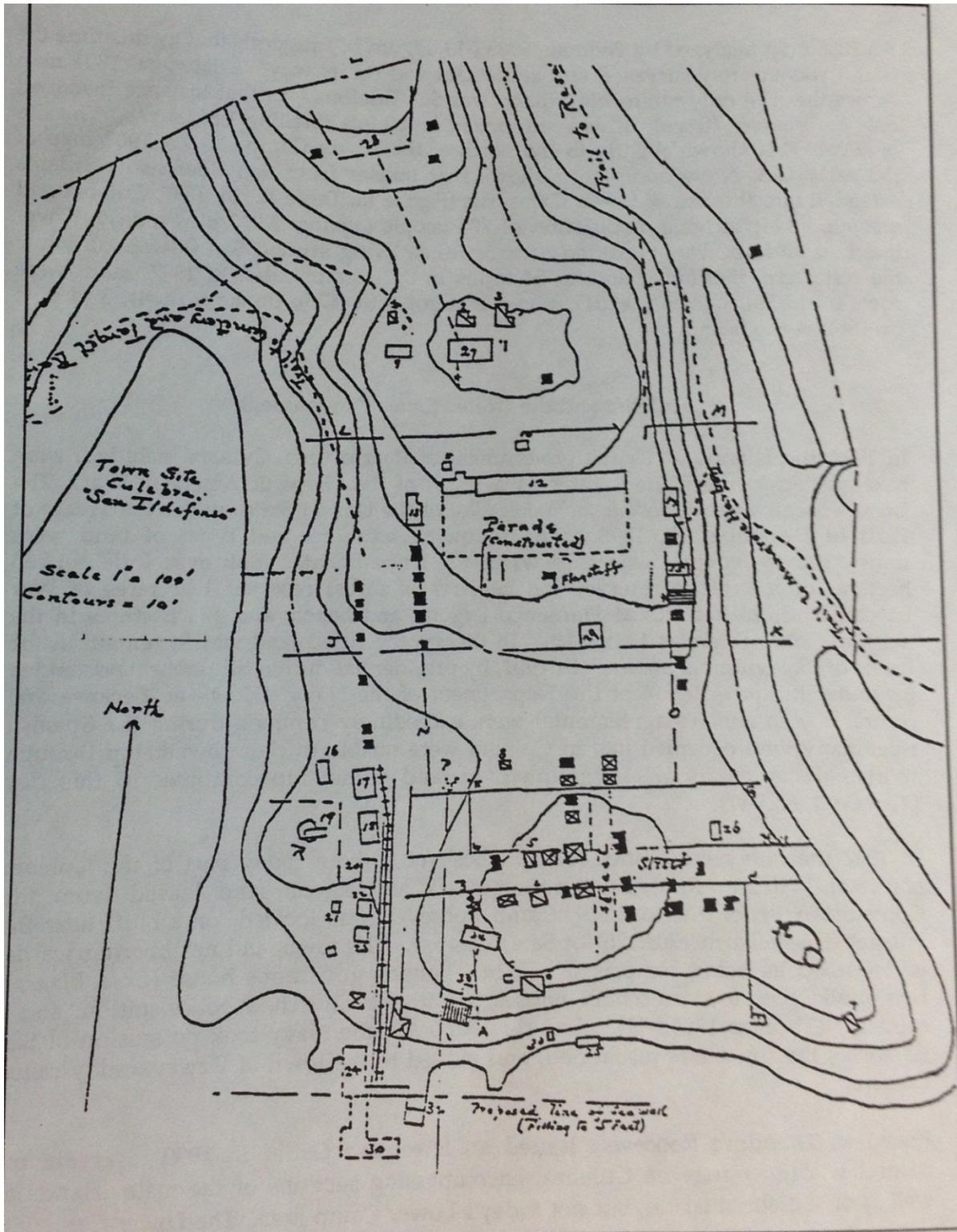


Figure 7a. Sketch of the USA Navy facilities under construction, as it took over San Ildefonso to establish Camp Roosevelt (1903).

Table 2. Accompanying Key for San Ildefonso and U.S. Navy Building Structures.

To be removed from Town site on or before April 1, 1905.
 Owners may have legal rights to a lot in the Town under Spanish grant Nov 8, 1888.
 Private owners
 Church and two School Houses claimed by the Insular Government of Porto Rico
 Delegation House

1	Actg Bodn Kenny	
2	Francisco Amador	
3	Bosn O'Connell	
4	Ricardo Romero	
5	Ricardo Romero	
6	Doctor McMurdo (USN)	
7	Woman Mulero, claiming to be widow of the late Dr. Hanes, USN	
8	Pedro Santiago	
9	Barracks Hospital	USMC
10	Ice House	"
11	Commissary Stores	"
12	Marine Barracks	"
13	Wash House and Bakery	"
14	Guard House, Canteen, Reading Room	"
15	Commanding Officer's Office	"
16	Blacksmith Shop	"
17	Temporary Shack	Ordnance
18	Quartermaster's Store House	USMC
19	Stable	"
20	Portable House	Equipment
21	Oil House	USMC
22	Store Shack	Gen storekeeper, Ord property
23	Shed	Temporary
24	Boat Shed and Carpenter's Shop (constructing)	C & R
25	Bath House	USMC
26	Search Light House	Secretary's Office
27	Cistern (100,000 gal) (constructing)	"
28	Water shed for same	"
29	Plaza cistern (now full) 17,500 gal	Repaired by USMC
30	Proposed wharf	Yards & Docks
31	Fresh water pump	USMC
32	Wharf	
33	Public Cistern (10,000 gal) built by former Spanish government	
34	Corrugated iron water shed for Wharf	

Compound A, B, C, D location for all Quarters, Administration Bldg at western end. Street about 30' wide to cut through to the northward about the center of the length of the compound a walk about 30' wide to extend along South front.

Compound E, F, G, H for the homes of Warrant Officers and Married Enlisted Men.

The boundary J, K, L, M for Marina Corps compound, R for bowling alley reading room and club for enlisted men.

Compound H for hospital use.

Figure 7b. Legend for the sketch of the USA Navy facilities and construction of Camp Roosevelt at San Ildefonso in 1903.

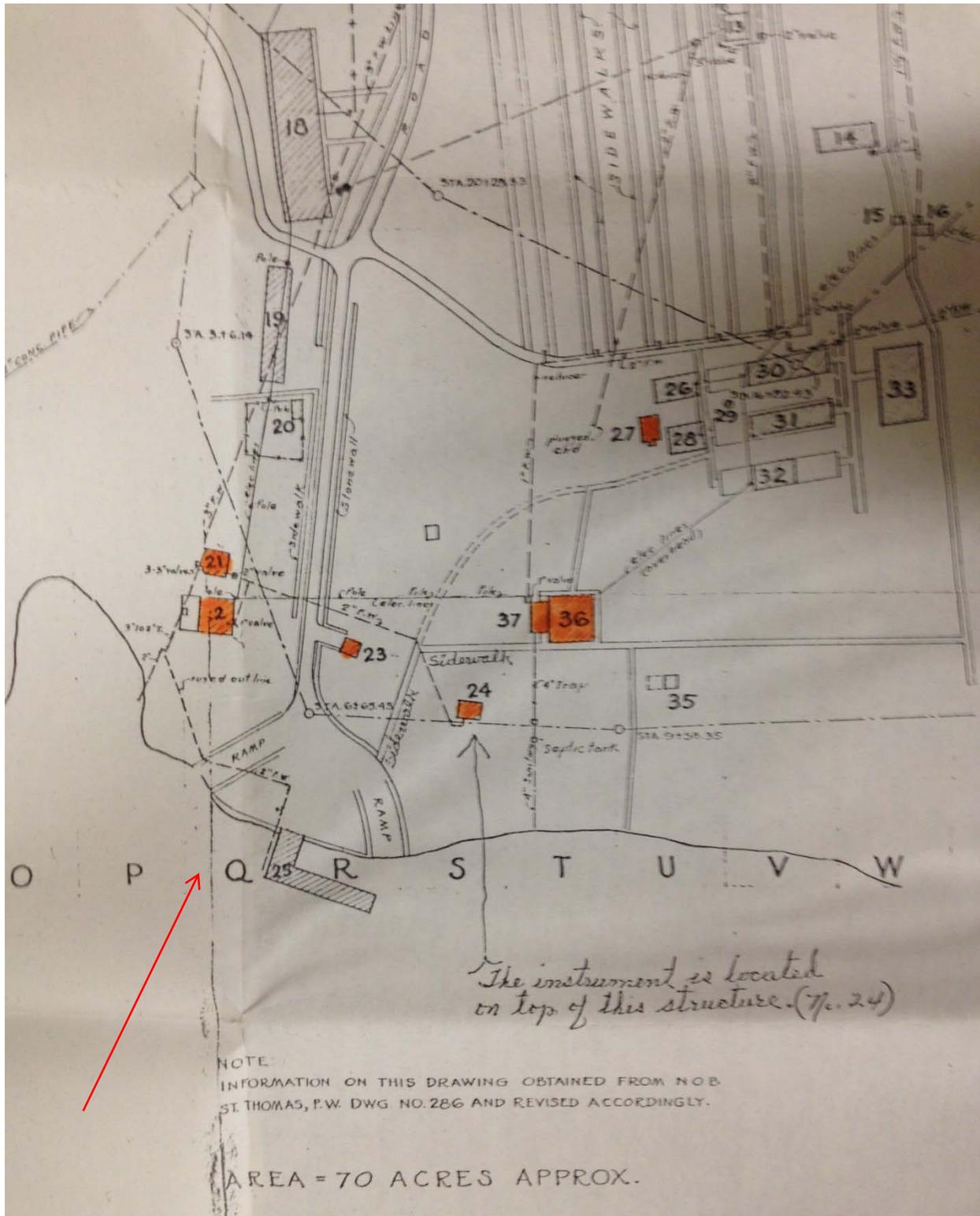


Figure 8a. Map of the south section Camp Roosevelt in 1944. The dock is similar in dimensions and configuration to the existing one.

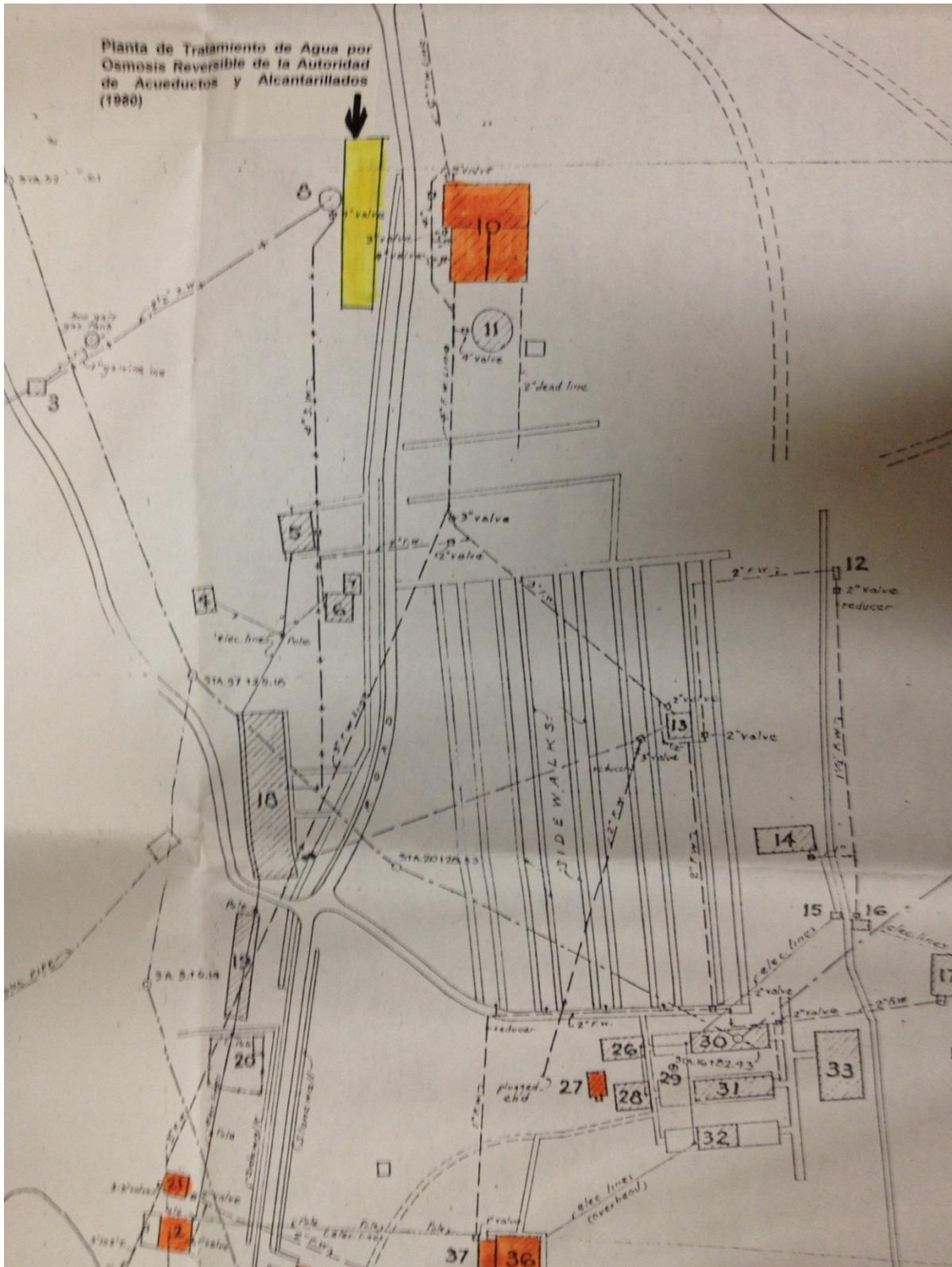


Figure 8b. Map of the north section of Camp Roosevelt in 1944.

Figure 8c. Legend for the 1944
 map of Camp Roosevelt.

• LEGEND •		
NO	LOCATION	STRUCTURE
1	R 4-5	CONC. RAIN WATER CATCHMENT (U.S.N.)
2	T 6	OLD MAGAZINE (U.S.N.)
3	P 11	SALT WATER PUMP HOUSE (U.S.N.)
4	Q 13	POWER HOUSE (U.S.N.)
5	R 12	OFFICERS BATH HOUSE (U.S.N.)
6	R 13	STORE BUILDING (U.S. ARMY)
7	S 13	CONCRETE PLATFORM (U.S.N.)
8	R 9	SALT WATER STEEL TANK (U.S.N.)
9	S 5	FRESH WATER CISTERN (U.S.N.)
10	T 9-10	FRESH WATER CISTERN (U.S.N.)
11	T 10-11	FRESH WATER STEEL TANK (U.S.N.)
12	W 13	TEMPORARY STEEL TANK
13	U-V 14	FRESH WATER CISTERN (U.S.N.)
14	V-W 15	STOREHOUSE (U.S. ARMY)
15	W 16	LIGHT PLANT 2KW (U.S. ARMY)
16	W 16	BATH HOUSE (U.S.N.)
17	X 16	REFRIGERATION PLANT (U.S. ARMY)
18	R 14-15	ENLISTED MEN BATH HOUSE (U.S.N.)
19	QR 16	STOREHOUSE (U.S. ARMY)
20	R 17	STABLE & CORRAL (U.S.M.C.)
21	Q 18-19	FRESH WATER CISTERN (U.S.N.)
22	Q 19	STONE STOREHOUSE (U.S.N.)
23	R 19	STOREHOUSE (OLD CISTERN) (U.S.N.)
24	S 20	FRESH WATER CISTERN (U.S.N.)
25	QR 21	CONCRETE DOCK
26	U 17	BARRACKS (U.S.C.G.)
27	U 17	STOREHOUSE (OLD CISTERN) (U.S.N.)
28	U 17	BARRACKS (U.S.M.C.)
29	U-V 17	FLAG POLE
30	V 17	COMMISSARY DISPENSARY & CO. QTS.
31	V 17	MESS HALL & GALLEY (U.S.M.C.)
32	V 16	LIBRARY & RECREATION BLDG (U.S.M.C.)
33	W 17	OLD TENNIS COURT
34	A 17	LATRINE (U.S.N.)
35	U 20	CHICKEN HOUSE & YARD
36	T 19	ADMINISTRATION BLDG (U.S.N.)
37	T 19	KITCHEN & SHOWER (U.S.N.)



ESTADO LIBRE ASOCIADO DE
PUERTO RICO
Guardia Nacional de
Puerto Rico

110730-3400

29 de julio de 2014

Miguel A. Ríos Torres
Representante Autorizado del
Gobernador ante FEMA

Sr. Ríos Torres:

Reciba un cordial saludo de parte de nuestro Ayudante General, General de Brigada, Juan J. Medina Lamela.

Hago referencia a su comunicado en el cual solicita un narrativo de operaciones en el muelle San Ildefonso ubicada en el Municipio de Culebra. En estos momentos, la Guardia Nacional de Puerto Rico no tiene ningún tipo de operación ocurriendo en el área del muelle. A la misma vez, no tenemos ninguna jurisdicción sobre dicho lugar.

De tener alguna duda o requerir información adicional, favor de comunicarse al 787-289-1626 o 787-289-1639.

Cordialmente,

Edwardo Toro
Mayor, GNPR
Oficial Administrativo



ESTADO LIBRE ASOCIADO DE
PUERTO RICO

Agencia Estatal para el Manejo de Emergencias
y Administración de Desastres

10 de julio de 2014

Ing. Alberto M. Lázaro Castro
Director Ejecutivo
Autoridad de Acueductos y Alcantarillados
PO Box 7066
San Juan, PR 00916-7066

Estimado ingeniero Lázaro:

La Autoridad de los Puertos tiene ante la consideración de la Agencia Federal para el Manejo de Emergencias (FEMA, por sus siglas en inglés) un proyecto de mitigación a través de la Oficina del Representante Autorizado del Gobernador (GAR, por sus siglas en inglés) ante FEMA. El mismo consiste en rehabilitar el muelle de carga de la Isla Municipio de Culebra, el cual se encuentra en avanzado estado de deterioro. A estos efectos, es necesario utilizar como muelle alternativo el muelle de San Ildefonso.

Para lograr que las agencias federales concedan el permiso correspondiente para el uso de dichas facilidades, se requiere presentar los planos del sistema de desalinización de agua que se encuentra en el área. Con esto, la Autoridad de los Puertos demostrará que dicho sistema no se verá afectado por la utilización del muelle como facilidad alterna.

Agradeceremos su gestión sobre este asunto y así lograr que podamos comenzar con la rehabilitación del muelle de carga lo antes posible. De tener cualquier pregunta, no dude en comunicarse con nuestra oficina.

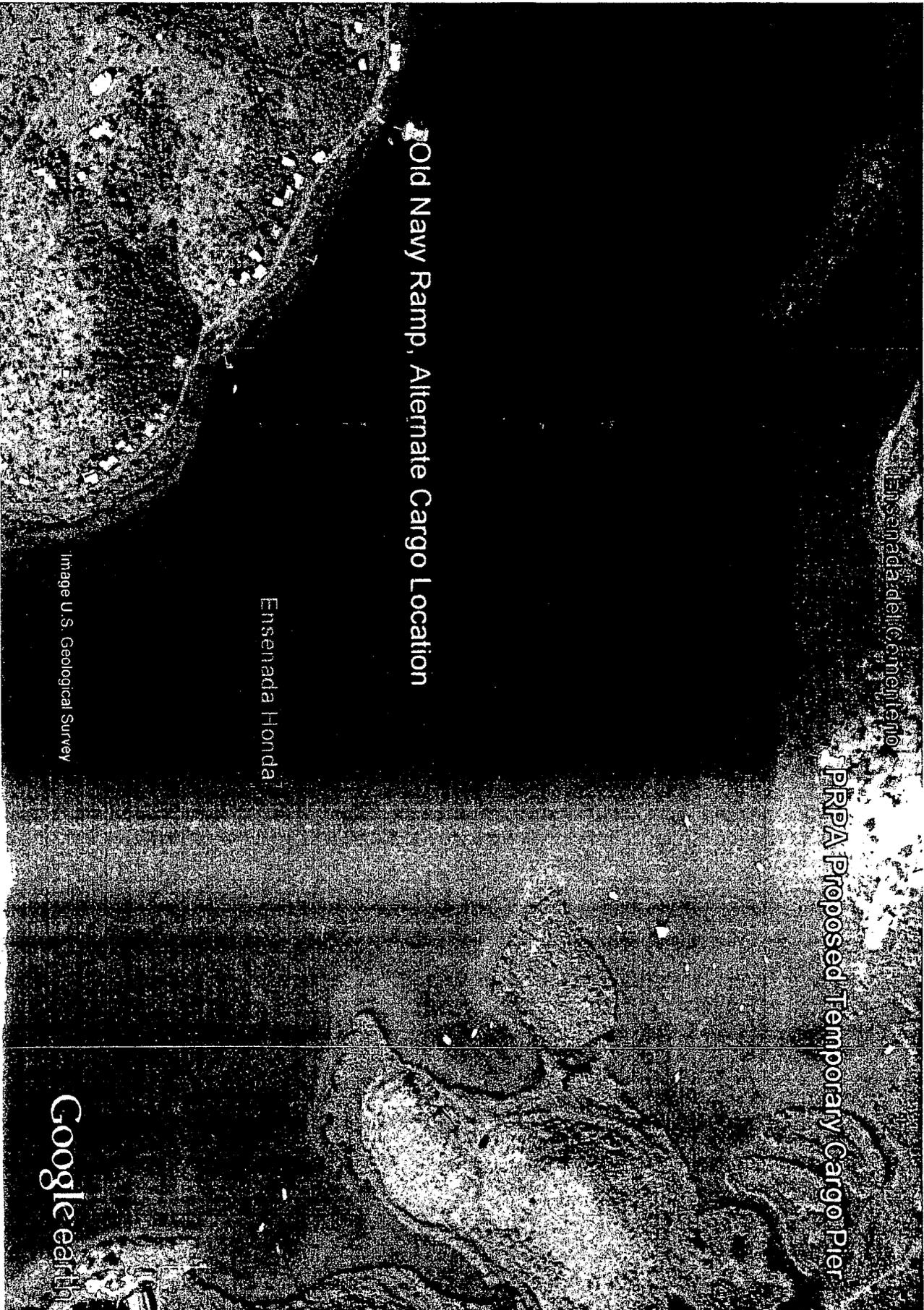
Muy agradecido,

Miguel A. Ríos Torres
Representante Autorizado del
Gobernador ante FEMA

- c Ing. Víctor Suárez-Director Ejecutivo, Autoridad de los Puertos
- Ing. Romel Pedraza-División Ingeniería, Autoridad de los Puertos
- Ing. Rubén Vega-Director Seguridad Corporativa y Emergencias, AAA



- 1) The proposed location in San Idelfonso is immediately adjacent to the intake for the Culebra Desalinization Plant. Based on the bathymetry, cargo ferry operations here may result in excessive sedimentation of the intake, loosen already consolidated sediments, or block the intake structure.
- 2) The assessment impacts between a temporary pier and permanent pier are quite different; a permanent structure would require a more detailed impact analysis as well as a higher level of compensatory mitigation. NOAA Fisheries has conducted surveys in the area and confirmed that there are extensive sea grass beds in the immediate vicinity of the proposed pier. The current design places the new cargo ferry in 12 feet of water, this may be too shallow to avoid scour of the bottom by the vessel's propellers. To minimize possible adverse impacts we recommended that the pier be extended out to the 19-20 foot contour to minimize propeller scour and sediment suspension. Impacts to seagrass beds and other marine habitats need to be adequately compensated. A detailed mitigation plan for all components of the project should accompany any NEPA document.
- 3) The road that connects the facility to the town of Dewey runs adjacent to mangrove wetlands and Ensenada Honda Bay at various locations. Any widening or improvements to the road to facilitate the increased use by cargo traffic, could impact these adjacent mangroves and marine ecosystems. PRPA stated they are not responsible for the roads; however, we recommended that all direct and indirect impacts related to the construction and operation of the cargo facility needs to be appropriately evaluated as part of the NEPA process.
- 4) The project may require a navigation channel to be appropriately marked with buoys leading to the pier facility. Impacts caused by additional buoy placement and anchorage would also have to be evaluated. NOAA Fisheries mentioned that PRPA would have to obtain a separate permit from the US Coast Guard to place and maintain those buoys.
- 5) As part of the NEPA process, we recommend that PRPA consider the alternative of using the existing Navy ramp in the southern end of Ensenada Honda (see map) for their temporary cargo dock. This ramp is closer to deep water and may require a shorter temporary floating dock thus minimizing impacts to seagrass and other marine ecosystems.
- 6) With regards to listed species, the Antillean Manatee has been reported inside Ensenada Honda Bay. Consultation with our office would have to be initiated by FEMA regarding possible effects during construction and operation of the facilities and the proposed minimization measures.



Ensenada de la Cumbre

PRPA Proposed Temporary Cargo Pier

Old Navy Ramp, Alternate Cargo Location

Ensenada Honda

Image U.S. Geological Survey

Google earth

Google earth

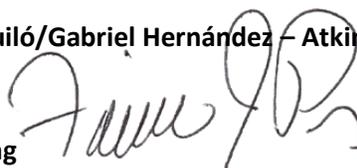
feet
km





ATKINS Caribe, LLP

Meeting Minutes

To: Culebra Cargo Ramp File, PRPA, Arturo Santiago
From: Francisco Pérez Aguiló/Gabriel Hernández – Atkins Caribe LLP
Date: July 2, 2014
Subject: Interagency Meeting 
Attendance: See enclosed. Initials utilized: **ASR**=Arturo Santiago Rivera (ATKINS), **EG**=Edgar García (USACE), **FL**=Félix López (FWS), **FS**=Flavio Silva (PRPA), **FP**=Francisco Pérez (ATKINS), **KB**=CDR. Kailie Benson (USCG), **LDLC**=Lorraine de la Cruz (PRPA), **LMC**=Lisamarie Carruba (NWFS), **MB**=Miguel Bonini (SHPO), **RP**=Romel Pedraza (PRPA), **RO**=Rose Ortíz (JP/CZMP), **SC**=Sindulfo Castillo (USACE)

Notes:

The PRPA presented this project to refurbish the only cargo terminal in Culebra, which is the lifeline for the ≈1,800 Culebra inhabitants and for the floating or seasonal population of ≈2,000. The purpose of the presentation at this forum is to seek the assistance and support of the regulatory agencies in streamlining the regulatory process. RP framed the presentation of a project that is vital to the wellbeing of Culebra, partially-funded by FEMA in the wake of damage caused by a Hurricane, and for a population with average income below the Island's at large. As describe the existing conditions, and FP presented the alternatives under consideration and the parameters that will be evaluated for each alternative.

- SC -Federally funded EA & NEPA standards means that the USACE can adopt the project. He asked for a schedule in order to prepare for its review.
- EG -Asked about contingencies arising from wave to protect the Sardina Dock for the future.
-On the Auxiliary Dock, take into consideration all the types of vessel that will use it.
-Asked the reason for a floating platform?
-Are channel markers proposed? USACE needs to know; the habitat of the mooring sites must be documented.
- LMC -NOAA/NMFS has been working with FEMA on this project since 2012, including a recent meeting, so she's already voiced her concerns.
-The use of an Auxiliary Dock may involve a formal Section 7 consultation, where the exclusive use of the Sardina Dock may be processed with an informal consultation.
-She said that the alternatives analysis must include the use of pilings at Sardinias to help mitigate for wind conditions and other limiting factors at that existing facility.
-FEMA has not initiated its consultations with the resource agencies.



ATKINS Caribe, LLP

- Likely will need to conduct a benthic survey for the placement of navigational aids in the proposed navigational channel, which would be required for the Auxiliary Pier.
- Suggests the use of mooring balls and/or dolphins at Sardinias Bay; area has been impacted.
- Suggests using the existing facilities due to timeline concerns and simpler regulatory framework. Did not have any objections in 2012; it has become a much larger project.
- FL -For the Sardinias refurbishment, standard manatee conditions and such would be required.
- For the San Ildefonso Pier, he is concerned with the impact that the sediment plume from the prop wash generated by the arriving ferry may have upon the PRASA desalination plant operation (intake water).
- Requested an assessment of seagrass beds at San Ildefonso in areas susceptible to prop dredging.
- Suggests that a mitigation plan be proposed for seagrass habitat impacts with the EA.
- CZM would not get involved if we stay with the Sardinias Bay.
- KB -Safety concerns at Sardinias Bay are a major concern. The Captain of the Port may shut down that operation any time due to existing unsafe condition of the platform.
- The proposed use of San Ildefonso as an alternative/auxiliary dock is “brilliant”.
- She has timeline concerns; the existing cargo structure may fail.
- MB -Only concerns pertain to the San Ildefonso location.
- Prehistoric and historic artifacts found by USFWS during the construction of PRASA’s intake facility (2002). SHPO Has archeological information obtained at the time.
- RO -Recommends that we submit the environmental document via OGPe prior to submittal of the Joint Permit Application.
- FS -Explains that the existing structure adjacent to the cargo ramp at Sardinias Bay is not designed to withstand the docking of the cargo ferry, nor the cargo loads.
- Also, the physical dimensions of the Sardinias Dock pose operational, logistical and safety constraints.

After the meeting concluded, Evelyn Colón of Federal Highway Authority (FHA) also added that the use of the State Road for this new use would likely require a permit from the Autoridad de Carreteras, Control de Acceso. That permit is also processed through OGPe.

She also mentioned that, if the bridge between the proposed floating dock and dry land is greater than or equal to twenty feet in length, it’s considered a “complex bridge”, which requires authorization from FHA and an inspection every two years, among others.

fjp

**US ARMY CORPS OF ENGINEERS
ANTILLES REGULATORY SECTION
INTERAGENCY MEETING**

NAME	E-MAIL	AGENCY/COMPANY	TELEPHONE NO.	FAX
René Esteves-Amador	rene.esteves-amador@noaa.gov	NMFS	414 8377	
Marisol J. Melóndez Maiz	Marisol.Melendezmaiz@fema.dhs.gov	FEMA-EHP	787-296-3554	
Melanie Giuliani	Melanie.giuliani@noaa.gov	NMFS		
Alwin Alvarado	Alwin.Alvaradogarcia@fema.dhs.gov	FEMA - Mitigation	787-296-3558	
Nelson Rivera	nriviera2@prera.pr.gov	GAR	787-724-0124	
JOSE E. AYACA	jose.ayala3@fema.dhs.gov	FEMA - EHP	787-296-3523	
Michael Bonini	mbonini@prshpo.gobierno.pr	SHPO	787-721-3737	
Evelyn S. Colón	evelyn.colon@dot.gov	FHWA	787-772-2514	
JOHANN M. SASSO	JOHANN.M.SASSO@USACE.ARMY.MIL			
Rose A. Ortiz Díaz	ortiz_r@jp.pr.gov	Junta de Planificación	X-16012 787-722-0101 #3	
José O. Sierra	jsierra@prpa.pr.gov	PRPA	787-729-8715 Ext. 2297	
JORGE ANDRADES	ANDRADES GARY 7 @ E.mail	Municipio Culebra	787 224-0022	
Flavio Silva Medanic	fsilva@prpl.pr.gov	PRPA	787-729-8715	
ARTURO SANTIAGO	arturo.santiago@atkinsglobal.com	ATKINS	787-294-2010	787-294-2002
GABRIEL HERNÁNDEZ	gabriel.hernandez@atkinsglobal.com	ATKINS	787-294-2010	
Agro. Lorraine de la Cruz	ldeacruz@prpa.pr.gov	PRPA	721-8715	
William I. Solís	alcaldecul2013@gmail.com	Municipio Culebra ALCALDE	787-742-3521	



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
ANTILLES OFFICE
400 FERNANDEZ JUNCOS AVENUE
SAN JUAN, PUERTO RICO 00901-3299

June 26, 2014

Antilles Regulatory Section

NOTICE

**US ARMY CORPS OF ENGINEERS
ANTILLES REGULATORY SECTION**

**INTERAGENCY MEETING
PUERTO RICO**

DATE : Wednesday, July 2, 2014

TIME : 09:30 AM

PLACE : PATIO CONFERENCE ROOM
U.S. Army Corps of Engineers' Facilities
San Juan, Puerto Rico

If you are unable to attend, please designate a member of your staff to participate. A preliminary agenda is enclosed.

If you have any questions, please call Ms. Angela Muñoz-Caro at telephones 787-729-6905/6944.

A handwritten signature in black ink, appearing to read "S. Castillo", with a long horizontal line extending to the left.

Sindulfo Castillo
Chief, Antilles Regulatory Section

U.S. ARMY CORPS OF ENGINEERS
ANTILLES REGULATORY SECTION

INTERAGENCY MEETING
FOR
PUERTO RICO

July 2, 2014

PATIO CONFERENCE ROOM

FINAL AGENDA

9:30 - 10:30

Mr. Flavio Silva, Project Manager
Mr. Romel Pedraza - Puerto Rico Ports Authority
Mr. Nelson Rivera Calderón – GAR (Governor's Authorized Representative)
Mr. Francisco Pérez Aguiló, Senior Project Manager, Atkins Caribe
Mr. Arturo Santiago – Mr. Gabriel Hernández, Atkins Caribe
Reconstruction of Culebra Cargo Ramp at Ferry Terminal
Culebra, Puerto Rico

10:45 – 11:45

Honorable William I. Solís, Mayor, Municipality of Culebra
Dr. Edwin Hernández, Scientific Advisor
Mr. Jorge Andrade, Advisor to the Mayor
Mr. Milton Cofresí, Advisor to the Mayor
Honorable Néstor González, President, Municipal Legislature
Ms. Teresa Cofresí, Municipal Secretary
Installation of Anchoring Buoys – Municipality of Culebra
Culebra, Puerto Rico

Se visitó la oficina de AAA Región Este en Caguas:

- Lunes, 9 de junio de 2014: Según indicado, se envió mapa de localización y descripción de la información solicitada al Ing. Luis González por correo electrónico.
- Miércoles, 11 de junio de 2014: Luego de no poder comunicarnos telefónicamente. Nos indicaron que estaban en comunicación con el Sr. Wilberto Conde para obtener la información. Se nos proveyó el correo electrónico del Sr. Conde al cual se le envió mapa de localización y descripción de la información solicitada.

Se llamó a la oficina de AAA Región Este en Caguas (787) 744-7795:

- Martes, 10 de junio de 2014: 11:20 am. No se logró comunicación. 12:40 pm. Secretaria indicó que ya se había solicitado información. Llamar en otra ocasión pues el Ing. González estaba reunido el resto del día.
- Miércoles, 11 de junio de 2014: 9:20 am y 11:30 am. No se logró comunicación.
- Jueves, 12 de junio de 2014: 1:30 pm. Se logró comunicación con el Ing. Luis González. Este indicó que debido al paro del gobierno no había podido atender la situación. Favor comunicarnos viernes o lunes.
- Viernes, 13 de junio de 2014: 2:15 pm. No se logró comunicación.
- Lunes, 16 de junio de 2014: 10:30 am. Secretaria indicó que el Ing. González estaba atendiendo otra llamada. 1:30 pm y 2:45 pm. No se logró comunicación.
- Jueves, 19 de junio de 2014: 9:40am, 11:30am y 3:15 pm. No se logró comunicación.
- Lunes, 23 de junio de 2014: 1:45 pm. No se logró comunicación.
- Miércoles, 25 de junio de 2014. 2:30 pm. No se logró comunicación.
- Martes, 1 de julio de 2014. 3:00 pm. No se logró comunicación.

Se llamó a la oficina de AAA Culebra/Vieques (787)741-2001 y (787)741-9500:

- Viernes, 27 de junio de 2014: 2:00 pm. No se logró comunicación.
- Martes, 1 de julio de 2014. 3:10 pm. Secretaria indico que el Sr. Conde estaba reunido que nos comunicáramos mas tarde. 3:40 pm y 4:00 pm. No se logró comunicación.

U.S. Department of Homeland Security
Region II- Caribbean Area Division
P.O. Box 70105
San Juan, Puerto Rico 00936-8105



FEMA

June 18, 2014

Mr. Miguel A. Ríos
Governor's Authorized Representative
Commonwealth of Puerto Rico
P.O. Box 194140
San Juan, PR 00919-4140

Re: Hazard Mitigation Grant Program (HMGP)
FEMA-4017-DR-PR, Project PR-0030
Puerto Rico Ports Authority (PRPA)
Structural Rehabilitation of Culebra's Cargo Pier

Dear Mr. Ríos:

On May 30, 2014, our office participated in a meeting with personnel from the PR Port Authority (PRPA), PRPA Consultants from Atkins Caribe, the National Oceanic Atmospheric Administration/ National Marine and Fisheries Services (NOAA/NMFS), the United States Fish and Wild Life Services (USFWS), and representatives from your office.

The purpose of the meeting was to review the proposed changes in the scope of work and obtain the comments of the environmental agencies regarding the associated environmental and historic issues of this project and to discuss the creation of a preliminary environmental assessment.

It is most important to laying out roles and responsibilities and the drafting of environmental documents for review and concurrence prior to their release for public comments. Since PRPA is responsible for the preparation of the Environmental Assessment (EA), our office provided guidance for the EA preparation, as well as FEMA website links for examples of recently prepared EAs.

It was agreed that FEMA will be the lead agency conducting the Section 7 Consultation, pursuant to the requirements of the Endangered Species Act (ESA). Also, it was further discussed and agreed that the concerns with endangered and threatened species and critical habitats raised in the NOAA/NMFS communication dated January 15, 2013 are still relevant and must be addressed in writing by PRPA and submitted to FEMA for the completion of the Section 7 Consultation process. FEMA will also be the lead agency conducting the Coastal Zone Consistency Review with the Puerto Rico Planning Board.

Mr. Miguel A. Ríos, GAR
First Phase Structural Rehabilitation
PR Ports Authority- Culebra's Cargo Pier
June 18, 2014
Page 2

Furthermore, since the new proposal aims towards the construction of a temporary cargo facility, several additional requirements were raised at the meeting by NOAA/NMFS and listed on their communication, dated June 07, 2014, as follows:

1. A complete benthic survey needs to be performed for all areas that will be impacted by the proposed project, including the new transit route to be used by the cargo ferry to access the temporary cargo landing and the turning basin required at the new cargo facility, and the footprint to be occupied by the new cargo platform and the ferry. The benthic survey should include details of the number and size of coral colonies colonizing the existing ferry facilities.
2. A complete alternatives analysis, including alternatives related to completing all work at the existing facilities only, construction of the proposed temporary cargo facility at the proposed site versus at alternate sites, including the former naval facilities, and the construction of the temporary cargo facility and the conversion of this facility to other uses (that must be clearly defined).
3. Details of the construction methodology to be used for all aspects of the proposed project, including the number of pilings and the method of installation and an analysis of the potential acoustic impacts of piling installation on sea turtles.
4. A bathymetric survey of the transit routes and areas of the proposed cargo pier facilities.
5. Details of the measures to be taken to avoid and minimize potential impacts to ESA resources to the maximum extent practicable from all project aspects following a thorough analysis of all potential impacts to ESA resources as a result of the preferred alternative selected for the project.

The possibility that the temporary cargo facility might remain in place for the use of the municipality was discussed. It was also emphasized that this alternative will change the purpose of the project and may affect the type and timing of ESA Section 7 consultation and any required federal/State permits.

The area of potential effects merits a thorough Archaeological/Historical Evaluation that should take into consideration all the previous archaeological and historic investigations conducted in the nearby areas. FEMA will prepare the scope of work for the Archaeological Evaluation, to be conducted by PRPA. If dredging for the navigation channel is necessary then, an Underwater Archaeological Reconnaissance will be needed.

PRPA will be responsible for obtaining all the required permits from the United State Army Corps of Engineers (USACE), the Department of Natural and Environmental Resources (DNER), U.S. Coast Guard (USCG) and any other required permits from local, state, or federal agencies.

Mr. Miguel A. Ríos, GAR
First Phase Structural Rehabilitation
PR Ports Authority- Culebra's Cargo Pier
June 18, 2014
Page 3

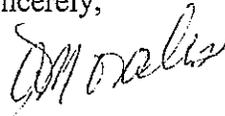
In addition, the PRPA should be submitting copies of the following documents to FEMA, no later than August 15, 2014. The documents are, as follows:

- Supporting documentation certifying that the local government will provide the additional funding needed.
- Documentation specifying who is the property owner and under whose jurisdiction the dock operates.
- Corresponding written authorization/certification for implementing improvements to the alternate facility.
- Supporting information from meetings and site visits to the alternate terminal with the U.S. Coast Guard (USCG). Also, certification from the USCG that the alternate dock is a feasible alternative.
- Certification of operations by the DNER for the alternate dock facility.
- Endorsement from the PR Aqueduct and Sewer Authority for the alternate dock facility which will be located next to the water intake facilities of Culebra's desalination plant.
- Endorsement from the PR National Guard (entity currently using this dock), indicating the dock improvements will also benefit them.
- Complete analysis of other three mitigation alternatives for Culebra's Port rehabilitation, including the "no action" alternative.
- Details of the construction methodology to be used in all stages of the proposed project, including the number of piling, method installation, and its potential acoustic impact on sea turtles.
- Measures that will be taken to avoid and minimize potential impacts to ESA resources.

Periodic follow up meetings are strongly recommended among your office and the PRPA in order to expedite the progress of this project through the required administrative process.

Should you have any questions or require additional information, please contact Mr. Sonny F. Beauchamp, HMA Coordinator, at (787) 296-3500.

Sincerely,



for Alejandro R. De La Campa
Disaster Recovery Manager

c: Mr. Iván R. Orlandi Cabán, Alternate GAR
Mr. Víctor A. Suárez Meléndez, Executive Director, Ports Authority
Mrs. Carel Velazquez, HMO

Rivera, Marcia I

From: Lisamarie Carrubba - NOAA Federal <lisamarie.carrubba@noaa.gov>
Sent: Saturday, June 07, 2014 8:26 PM
To: alwin.alvaradogarcia@fema.dhs.gov; Ayala, Jose; nrivera@ogp.pr.gov; Romel Pedraza; Lorraine De la Cruz Cobian; Flavio Silva Madera; Jose Sierra Rivera
Cc: sonny.beauchamp@fema.dhs.gov; marisol.melendezmaiz@fema.dhs.gov; Felix_Lopez@fws.gov; Perez, Francisco; cvelazquez@prema.pr.gov; Anabel Padilla
Subject: Culebra Island Ferry Terminal and Proposed New Cargo Landing, FEMA-4017-DR-PR-0030
Attachments: excerpts from NMFS draft explosives guidelines (1).docx; pile_driving_snd_comp9_27_07.pdf

Saludos a todos:

As we discussed during our May 30, 2014, meeting, FEMA will be the lead agency conducting the Section 7 consultation pursuant to the requirements of the Endangered Species Act (ESA) for the proposed rehabilitation of the existing passenger ferry and construction of a temporary cargo landing.

As noted in my email of January 15, 2013, ESA resources that must be considered as part of the consultation include hawksbill, green, leatherback, and loggerhead sea turtles, elkhorn and staghorn corals and the 7 additional coral species currently proposed for ESA listing, coral critical habitat, and green sea turtle critical habitat. The information in my January 2013 email is still relevant and has not been addressed as part of the project to date based on the information discussed during our May 2014 meeting.

In addition, because there is now a proposal to construct a temporary cargo facility, there are several additional issues that need to be addressed that are listed below.

1. a complete benthic survey needs to be performed for all areas that will be impacted by the proposed project, including the new transit route to be used by the cargo ferry to access the temporary cargo landing, the turning basin required at the new cargo facility, and the footprint to be occupied by the new cargo platform and ferry. The benthic survey should include details of the number and size of coral colonies colonizing the existing ferry facilities.
2. a complete alternatives analysis, including alternatives related to completing all work at the existing facilities only, construction of the proposed temporary cargo facility at the proposed site versus at alternate sites, including the former naval facilities, and the construction of the temporary cargo facility and the conversion of this facility to other uses (that must be clearly defined).
3. details of the construction methodology to be used for all aspects of the proposed project, including the number of pilings and the method of installation and an analysis of the potential acoustic impacts of piling installation on sea turtles
4. a bathymetric survey of the transit routes and areas of the proposed cargo pier facilities
5. details of the measures to be taken to avoid and minimize potential impacts to ESA resources to the maximum extent practicable from all project aspects following a thorough analysis of all potential impacts to ESA resources as a result of the preferred alternative selected for the project

I am attaching excerpts from an explosives guidance document that was drafted by NMFS and is in review for finalizing and publishing. There is an equation highlighted from a different project, but some of the calculations can be used for acoustic analysis for pile driving and other in-water construction that generates acoustic impacts. I am also attaching some acoustic information related

to pile driving. Note that the guidelines we have are internal documents only so cannot be shared, but the two documents I have attached are more than enough to calculate acoustic impacts. Please see <http://el.erdc.usace.army.mil/elpubs/pdf/trel08-41.pdf> for information regarding dock construction guidelines for the protection of seagrass as well.

During our recent meeting, we discussed the possibility that the temporary cargo facility might remain in place for other uses by the municipality. If this is the case, this will change the purpose of the project and may affect the type and timing of ESA Section 7 consultation and any required federal permits.

As we talked about during our recent meeting, it is not possible to determine whether the ESA consultation will be formal or informal. If the consultation is formal, Section 7 allows NMFS up to 90 days to conclude formal consultation with your agency and an additional 45 days to prepare our biological opinion once we have received a complete application package. The ESA requires that, after initiation of formal consultation, the federal action agency must make no irreversible or irretrievable commitment of resources that limits future options. This practice ensures agency actions do not preclude the formulation and implementation of reasonable and prudent alternatives that avoid jeopardizing the continued existence of endangered or threatened species, or destroying or modifying their critical habitats.

Please note that this message, coupled with my message of January 2013, do not necessarily contain all the details of the information needed for the ESA Section 7 consultation or identify all the concerns we may have related to potential project impacts because the information regarding the project received to date is inadequate for a thorough analysis of potential effects to ESA resources.

Please let me know if you have any questions regarding this information.

Thank you

Dr. Lisamarie Carrubba

NOAA Fisheries

Caribbean Field Office, PRD

P.O. Box 1310

Boquerón, PR 00622

[787-851-3700](tel:787-851-3700)

[787-851-5588](tel:787-851-5588) (fax)

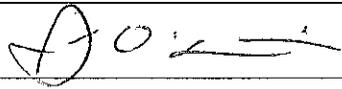
**DEPARTMENT OF HOMELAND SECURITY
FEDERAL EMERGENCY MANAGEMENT AGENCY
CARIBBEAN AREA OFFICE**



FEMA

P.O. Box 70105
San Juan, PR 00936

	MEETING: Discuss the Status of Environmental Documents Regarding FEMA-4017-DR-PR-0030, Rehabilitation of Culebra Terminal Cargo Ramp.	DATE: May 30, 2014	ADDRESS/PLACE: FEMA Caribbean Area Division	
	NAME (Please Print)	SIGNATURE	AGENCY/TELEPHONE	E-MAIL
1.	Sonny Beauchamp		DHS/FEMA 787-296-3500	Sonny.Beauchamp@fema.dhs.gov
2.	Alwin Alvarado		DHS/FEMA 787-296-3500	Alwin.Alvaradogarcia@fema.dhs.gov
3.	José Ayala		DHS/FEMA 787-296-3500	Jose.Ayala3@fema.dhs.gov
4.	Marisol Melendez		DHS/FEMA 787-296-3500	Marisol.Melendezmaiz@fema.dhs.gov
5.	Nelson Rivera Calderon		Office of the GAR 787-725-9420, ext.2426	nrivera2@ogp.gobierno.pr 787-627-1009 / 787-724-0124 x 40050
6.	Francisco Pérez Aguiló		Atkins 787 294-2010/439-5768	francisco.perez@atkinsglobal.com
7.	Lisamarie Carralbo		787-851-3700	lisamarie.carralbo@prpa.gov
8.	Felix Lopez		787-851-7297	Felix_lopez@fws.gov
9.	Carel Velázquez Polv		787-724-0124 40050	cvelazquez@prema.pr.gov
10.	Romel Pedraza		787-729-8715 ext. 3178	rpedraza@prpa.pr.gov
11.	Lorraine de la Cruz Estorán		729-8715	ldelacruz@prpa.pr.gov
12.	Flavis Silva Mendez		729-8715	fsilva@prpa.pr.gov

	MEETING : Discuss the Status of Environmental Documents Regarding FEMA-4017-DR-PR-0030, Rehabilitation of Culebra Terminal Cargo Ramp.	DATE: May 30, 2014	ADDRESS/PLACE: FEMA Caribbean Area Division	
	NAME (Please Print)	SIGNATURE	AGENCY/TELEPHONE	E-MAIL
13.	José O. Sierra		PRPA 787-729-8715 EXT. 2297	jsierra@prpa.pr.gov
14.				
15.				
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				



ATKINS Caribe, LLP

Notas de Reunión -

A: Expediente, PRPA, Arturo Santiago

De: Francisco Pérez Aguiló – Atkins Caribe LLP

Fecha: 30 de mayo de 2014

Asunto: Culebra Cargo Ramp

Asistencia: Ver listado adjunto. Iniciales utilizadas a continuación: AA=Alwin Alvarado (FEMA), FL=Félix López (FWS), LDLC=Lorraine de la Cruz, LMC=Lisamarie Carruba (NWFS), MM=Marisol Meléndez (FEMA), NR=Nelson Rivera (GAR), RP=Romel Pedraza (PRPA).

NOTAS:

El Jefe de la División de Mitigación de FEMA, Sonny Beauchamp, nos dio la bienvenida e hizo un resumen del proyecto. Indicó estar preocupado por el financiamiento del proyecto, dados los aumentos en el alcance del trabajo, e indicó que los fondos de FEMA ni aumentarán o se reducirán. También indicó preocupación por el tiempo de desempeño; bajo el programa que se aprobaron los fondos hay que terminar el proyecto en 2 años (más 1 año). Aclaró que todo lo contratado tiene que cumplir también con los estándares federales. Pidió que tengamos cuidado con la información que se disemina: Para la prensa, todo debe ir a través de los oficiales de prensa de FEMA o de PRPA.

AA Leyó el Resumen Ejecutivo (copia recibida).

AA Preguntó sobre el avance de PRPA desde la última reunión, y entonces fuimos uno por unos sobre los puntos en la sección “challenges” del Resumen Ejecutivo.

NR Tenemos una resolución conjunta autorizando los fondos de pareo, incluyendo el alcance de trabajo adicional.

RP La titularidad del predio propuesto para el terminal temporero es del Municipio, quien no ha entregado la carta accediendo a su uso.

FL Trajo a colación el impacto de la turbidez que causaría el uso temporero propuesto a la toma de agua de la planta desalinizadora, que supe agua en emergencias a Culebra. Aunque al presente no está operando, es infraestructura permanente que hay que considerar.

LMC Tanto para NEPA como para la consulta de impacto a especies en peligro de extinción requieren un Análisis de Alternativas, que deben considerar todos los impactos potenciales.

LDLC Ya se realizó un análisis de alternativas.

LMC/FL Proponen extender el muelle flotante propuesto hasta que las hélices del ferry queden a 19



ATKINS Caribe, LLP

- pies de profundidad, lo propuesto actualmente está en 12 pies. Hay que pedirle un endoso a AAA.
- LMC Mientras más profundo el fondo en el área de atraque del ferry, menos impactos de turbidez y al fondo (recurso) marino. LMC hizo un estudio de las hierbas marinas que puede compartir.
- FL En caso que el muelle temporero fuese a permanecer, hay que hacerle canal de navegación y ponerlo en las cartas de navegación. Para la facilidad temporera, hay que instalar y mantener boyas de navegación desde la entrada de Ensenada Honda.
- LMC Se requiere una batimetría.
El mes próximo se aumenta la lista de corales en la lista de especies amenazadas y en peligro de extinción, y tienen que ser consideradas: Si se van a impactar los que están en los pilotes existentes hay que mitigar.
Toda la costa de Culebra es hábitat crítico del peje blanco (*Chelonia mydas*), incluyendo Ensenada Honda, lo que hace posible una consulta formal (Section 7 Endangered Species Act).
Incluir esto en el análisis de alternativas, incluyendo los costos de mitigación. Si el muelle es temporero los impactos se consideran diferente, menores. El análisis de alternativas tiene que considerar si el uso propuesto es permanente, temporero de verdad o temporero en uso intenso y luego de cierto tiempo el uso es ocasional.
- Paréntesis del Director de la División del Caribe de FEMA, Alejandro de la Campa, que se encontraba en la oficina. En FEMA están para salvar vidas y la propiedad. Su administración está comprometida con la restauración del muelle de carga de Culebra. Está dispuesto a considerar extensiones de tiempo dada su importancia para Culebra.
- RP USCG ya autorizó verbalmente.
- AA Se requiere consulta por escrito, con el USCG y con la Guardia Nacional, entidad que utiliza las facilidades actualmente; esto no se ha hecho.
- LMC/FL Sugieren que se haga una consulta con el Distrito 7 del Coast Guard (Miami, Paul Leeman) respecto a las ayudas a la navegación.
- MM/LMC Los impactos ambientales del proyecto tienen que considerar la huella completa, que incluye la ruta de tránsito vehicular: Hay un puente sobre un manglar y algunos tramos de la ruta que posiblemente no tienen la capacidad para carga pesada.
- LDLC Pedir al Municipio información sobre la carretera.
- MM/LMC Estudio arqueológico subacuático: Aparentemente hay 3 yacimientos arqueológicos; en adición, el sitio propuesto para el muelle temporero fue el poblado original de Culebra, que tiene estructuras y yacimientos registrados. Tom Freeman o José Méndez (USACE, Planificación) tienen todos los estudios. La consulta de SHIPO la hace FEMA.
- FL/LMC Se requiere una Concesión de DNER y la certificación de consistencia con el Plan de Manejo de la Zona Costanera.
- LMC Si el atraque temporero permanece en el muelle existente (Sardina), la consulta Sección 7 sería informal con condiciones y monitoreo, si se quedan los corales donde están. Mucho más sencillo todo.



ATKINS Caribe, LLP

Conclusiones:

- Análisis de alternativas debería ser el próximo paso.
- Buscar endoso de AAA y autorización escrita del propietario (Municipio) y el usuario (PRNG).
- Consulta de navegación al Coast Guard.
- Considerar extensión a la plataforma flotante para buscar los 19 pies de profundidad.
- Realizar la batimetría.
- Consulta a SHIPO la hace FEMA.
- FEMA nos enviará el formato de la EA.
- Hace falta estudio béntico y de corales en el área del muelle temporero.
- Establecer un programa de reuniones mensualmente (FEMA/PRPA).
- Si el muelle temporero es en Ensenada Honda, entonces:
 - Biological Assessment (180 días) y FEMA no puede hacer final y firme ningún compromiso monetario (LMC) hasta que esto se realice.
 - Si llegan a una determinación de *Jeopardy* (poner en peligro) ó de que se está modificando hábitat crítico, lo más probable es que el USACE no otorgue el permiso.
- Nelson Rivera (GAR) solicitó copia del Estudio Marino del terminal existente.

Durante la reunión nos entregaron tres documentos:

- 140303 PRPA Solicitud extensión de tiempo a GAR
- Culebra Cargo Ramp Hazard Mitigation Final Extension (aquí está el Resumen Ejecutivo)
- PRPA Funds Application

fjp

Rivera, Marcia I

From: Lisamarie Carrubba - NOAA Federal <lisamarie.carrubba@noaa.gov>
Sent: Tuesday, January 29, 2013 4:53 PM
To: Lebron, Jose
Cc: Pabon, Jaime; Ivelisse Lorenzo Torres; Milagros Rodriguez Castro; Beauchamp, Sonny; Alvarado garcia, Alwin; nrivera@ogp.pr.gov; Ayala, Jose; npedraza@prpa.pr.gov; Lorraine De la Cruz Cobian; Jose Sierra Rivera
Subject: Re: Reconstruction of Culebra Island Ferry Terminal Cargo Platform, HMGP-FEMA-DR-4017-PR

Saludos, como indique en mi ultimo mensaje a Jaime Pabon, no creo que la visita de campo es necesario en estos momentos ya que la informacion Jaime envio contesto las preguntas sobre la comunidad bentica y la colonizacion de los pilotes por corales. Tambien como indique en el ultimo mensaje, por razones de presupuesto, mi agencia ha recibido un directriz de cortar todos los viajes hasta nuevo aviso excepto los que ya tenia aprobacion porque estaban incluidos en el plan para los primeros dos semestres de este año fiscal.

Ya lo que queda es el plan de trabajo detallado.

Lee

On Tue, Jan 29, 2013 at 10:04 AM, Lebron, Jose <Jose.Lebtron@fema.dhs.gov> wrote:

Buenos días:

Nos interesa saber, en FEMA, si de acuerdo a la información al día de hoy se coordinó la visita a Culebra y cuando será realizada. En la reunión se acordó que la fecha para que la propuesta estuviese revisada fuese el 8 de febrero de 2013.

Estamos pendiente a que nos confirmen.

Gracias,

José A. Lebrón

Hazard Mitigation Engineer

FEMA - Region II Caribbean Area Division

[787-296-3500](tel:787-296-3500)

From: Lisamarie Carrubba - NOAA Federal [mailto:lisamarie.carrubba@noaa.gov]

Sent: Tuesday, January 22, 2013 1:13 PM

To: Pabon, Jaime

Cc: Ivelisse Lorenzo Torres; Milagros Rodriguez Castro; Beauchamp, Sonny; Lebron, Jose; Alvarado garcia, Alwin; nrivera@ogp.pr.gov; Ayala, Jose; npedraza@prpa.pr.gov; Lorraine De la Cruz Cobian; Jose Sierra

Subject: Re: Reconstruction of Culebra Island Ferry Terminal Cargo Platform, HMGP-FEMA-DR-4017-PR

Please refer to the following site: <http://sero.nmfs.noaa.gov/pr/esa/82CoralSpecies.htm> for information on the corals NMFS proposes listing under the Endangered Species Act (ESA).

Please note that, because the corals include 3 species of *Montastraea* and your report, although it did not specify which of the 3 species is on the piling, did identify that corals from the *M. annularis* complex are colonizing the pilings, means that we recommend FEMA include these corals in the ESA Section 7 through a conference. As part of the conference, measures to avoid and minimize impacts to these corals should be included in the project design and implementation.

As we discussed during our project meeting at FEMA's office on January 9, we need to know the temporary and permanent construction footprint over benthic habitat. If the maps you prepared as part of your survey are adequate to determine this (and it appears they are because you have a rough estimate of where seagrass beds dominated by 3 different species are located in relation to the project), then you can use this information to estimate permanent and temporary impacts, as well as design the project, including the use of vessels versus terrestrial operations during construction, in order to avoid and minimize impacts to seagrass beds.

The information you provided can be used in drafting the detailed work plan discussed during the project meeting.

Thank you,
Lee

--

Dr. Lisamarie Carrubba
NOAA Fisheries
Caribbean Field Office, PRD
P.O. Box 1310
Boquerón, PR 00622
[787-851-3700](tel:787-851-3700)
[787-851-5588](tel:787-851-5588) (fax)

On Tue, Jan 22, 2013 at 7:47 AM, Pabon, Jaime <Jaime.Pabon@atkinsglobal.com> wrote:

Good morning.

Attached is a study that was conducted on the referenced site pilings in 2010. Our study goal at that stage was to document presence or absence of coral and sponges in the pilings, as well as overall benthic habitat identification. This was a 1 day effort, so no plots, transects or distribution type study was conducted.

Would you require more detailed studies?

Additionally, could you please provide the list of the proposed listing of species of coral?

Thank you.

Jaime A. Pabón, J.D., M.S.

Vice President - Environmental Group Manager

ATKINS

75 years of design, engineering and project management excellence

Metro Office Park Lot 8, 1st Street, Suite 102, Guaynabo, Puerto Rico 00968

Tel: [+1 \(787\) 294 2010](tel:+1(787)2942010). Ext. 430-1229 | Cel: [+1 \(787\) 319 2352](tel:+1(787)3192352) | Fax: [+1 \(787\) 294 2002](tel:+1(787)2942002)

Email: jaime.pabon@atkinsglobal.com | Web: www.atkinsglobal.com/northamerica www.atkinsglobal.com

From: Ivelisse Lorenzo Torres [mailto:ilorenzo@prpa.pr.gov]

Sent: Wednesday, January 16, 2013 1:01 PM

To: Lisamarie Carrubba - NOAA Federal; Pabon, Jaime; Milagros Rodriguez Castro

Cc: sonny.beauchamp@fema.dhs.gov; Lebron, Jose; alwin.alvaradogarcia@fema.dhs.gov; nrivera@ogp.pr.gov; Ayala, Jose; npedraza@prpa.pr.gov; Lorraine De la Cruz Cobian; Jose Sierra

Subject: RE: Reconstruction of Culebra Island Ferry Terminal Cargo Platform, HMGP-FEMA-DR-4017-PR

Saludos Carrubba,

I am forwarding this email to the environmental consultant for the project, Atkins, in case they have any questions can ask directly to you. They will conduct the required environmental studies, if any.

Cordially,

PS: Please let me know the date to go to Culebra to see the corals in pier piles.

Ivelisse Lorenzo Torres

Environmental Inspector

Oficina de Asuntos Ambientales, SIAAME

Of. [787-729-8715](tel:787-729-8715) * 3231

Fax: [787-725-6569](tel:787-725-6569)



From: Lisamarie Carrubba - NOAA Federal [mailto:lisamarie.carrubba@noaa.gov]

Sent: Tuesday, January 15, 2013 10:38 AM

To: sonny.beauchamp@fema.dhs.gov; Lebron, Jose; alwin.alvaradogarcia@fema.dhs.gov; nrivera@ogp.pr.gov; Ayala, Jose; npedraza@prpa.pr.gov; Lorraine De la Cruz Cobian; Jose Sierra; Ivelisse Lorenzo Torres

Subject: Reconstruction of Culebra Island Ferry Terminal Cargo Platform, HMGP-FEMA-DR-4017-PR

Saludos a todos:

As we discussed during our January 9, 2013, meeting, as part of our Section 7 Endangered Species Act (ESA) consultation with FEMA as the lead federal agency providing funding for the reconstruction of the Culebra Island Ferry Terminal Cargo Platform, we need some additional information regarding the project. The project is located in an area where hawksbill and green sea turtles are common and loggerhead sea turtles may also be present. We do not expect leatherback sea turtles in the immediate project area. However, if work will take place from the water and barges or other vessels will transit to and from Culebra during the construction period, then there could be limited interactions with leatherback sea turtles if work takes place during nesting season for these animals. The area up to 3 nm around Culebra and its surrounding islands and cays is also designated critical habitat for green sea turtles. Waters up to 30 m in depth with substrate suitable for coral settlement and growth has also been designated as coral critical habitat and occurs around Culebra.

We need to know the details of the construction method in terms of whether work will take place from land or water, duration of the project, and whether or not benthic habitats are present in the footprint of permanent and temporary construction impacts. If vessels will be used, we will need to know the vessel draft and other details of the vessel to assess potential impacts from propeller wash, anchoring, spudding, etc. We also need details regarding the scope of the project in terms of reuse of pilings and other portions of the structure versus removal and replacement of sections of the cargo dock. Whether ESA-listed corals are present on any pilings that could be affected by the proposed construction also needs to be determined. It was agreed that PRPA and NMFS

will look at old project files and NMFS will look at seagrass surveys that have been conducted in Culebra to determine whether there is existing information regarding benthic habitat and coral colonization of pilings already available.

I have attached the vessel strike avoidance and reporting guidelines developed by NMFS. These guidelines are applicable for all vessel operations related to the construction and operation of the dock. I sent the Sea Turtle Construction Conditions as part of my October 3, 2012, e-mail message regarding the project, which should be incorporated in the construction methods for the project.

We also discussed other special conditions/measures to avoid potential impacts to ESA resources that should be incorporated in the project (in addition to the vessel strike and construction guidelines). However, other conditions related to the projection of critical habitat or ESA-listed coral colonies may also need to be incorporated in the project depending on the benthic habitat and coral colonization of the pilings once that information is available. Measures to reduce the potential for impacts to ESA resources as part of the project that we discussed on January 9 include:

1. the use of a floating platform or other measure to receive and contain demolition and construction debris and keep it from entering waters of the bay during all demolition and construction operations and the regular upland disposal of these materials in a confined upland site
2. the use of turbidity barriers or other measures to minimize the potential for sediment resuspension and the transport of resuspended sediment and other materials from the construction site to the bay
3. regular monitoring and maintenance of turbidity barriers to ensure they are effective and that they do not fail, potentially resulting in impacts to sea turtles. Monitoring should also be done during installation of these barriers to ensure no sea turtles are trapped within the barriers when they are installed.
4. as noted above, the incorporation of vessel strike and sea turtle construction conditions in the project operation
5. the selection of anchor and spud points (if applicable) to avoid impacts to benthic habitat such as corals, colonized hardbottom, and seagrass
6. the designation of transit and anchor locations for vessels to be used as part of the project (if applicable) avoid accidental groundings

We also discussed the proposed listing of seven additional coral species that may occur in the project area. Therefore, benthic information and information on coral colonization of the pilings should include information regarding the presence of one or more of these species. FEMA can elect to incorporate avoidance and minimization measures to protect these species in the project as part of a conference with NMFS rather than having to reopen consultation if the project has not been completed when the final listing decision is published should any of these species be located in the project area.

Please let me know if you have any questions regarding the information we need to complete our review of the project, including the minimization measures.

Thank you,
Lee

--

Dr. Lisamarie Carrubba
NOAA Fisheries
Caribbean Field Office, PRD
P.O. Box 1310
Boquerón, PR 00622
[787-851-3700](tel:787-851-3700)
[787-851-5588](tel:787-851-5588) (fax)

This message has been checked for threats by Atkins IS

This electronic mail communication may contain privileged, confidential, and/or proprietary information which is the property of The Atkins North America Corporation, WS Atkins plc or one of its affiliates. If you are not the intended recipient or an authorized agent of the intended recipient please delete this communication and notify the sender that you have received it in error. A list of wholly owned Atkins Group companies can be found at <http://www.atkinsglobal.com/site-services/group-company-registration-details>

Consider the environment. Please don't print this email unless you really need to.

--

Dr. Lisamarie Carrubba
NOAA Fisheries
Caribbean Field Office, PRD
P.O. Box 1310
Boquerón, PR 00622
787-851-3700
787-851-5588 (fax)

Rivera, Marcia I

From: Lisamarie Carrubba - NOAA Federal <lisamarie.carrubba@noaa.gov>
Sent: Tuesday, January 15, 2013 10:38 AM
To: sonny.beauchamp@fema.dhs.gov; Lebron, Jose; alwin.alvaradogarcia@fema.dhs.gov; nrivera@ogp.pr.gov; Ayala, Jose; npedraza@prpa.pr.gov; Lorraine De la Cruz Cobian; Jose Sierra Rivera; Ivelisse Lorenzo Torres
Subject: Reconstruction of Culebra Island Ferry Terminal Cargo Platform, HMGP-FEMA-DR-4017-PR
Attachments: SER Ship Strike Report_Feb08.pdf

Saludos a todos:

As we discussed during our January 9, 2013, meeting, as part of our Section 7 Endangered Species Act (ESA) consultation with FEMA as the lead federal agency providing funding for the reconstruction of the Culebra Island Ferry Terminal Cargo Platform, we need some additional information regarding the project. The project is located in an area where hawksbill and green sea turtles are common and loggerhead sea turtles may also be present. We do not expect leatherback sea turtles in the immediate project area. However, if work will take place from the water and barges or other vessels will transit to and from Culebra during the construction period, then there could be limited interactions with leatherback sea turtles if work takes place during nesting season for these animals. The area up to 3 nm around Culebra and its surrounding islands and cays is also designated critical habitat for green sea turtles. Waters up to 30 m in depth with substrate suitable for coral settlement and growth has also been designated as coral critical habitat and occurs around Culebra.

We need to know the details of the construction method in terms of whether work will take place from land or water, duration of the project, and whether or not benthic habitats are present in the footprint of permanent and temporary construction impacts. If vessels will be used, we will need to know the vessel draft and other details of the vessel to assess potential impacts from propeller wash, anchoring, spudding, etc. We also need details regarding the scope of the project in terms of reuse of pilings and other portions of the structure versus removal and replacement of sections of the cargo dock. Whether ESA-listed corals are present on any pilings that could be affected by the proposed construction also needs to be determined. It was agreed that PRPA and NMFS will look at old project files and NMFS will look at seagrass surveys that have been conducted in Culebra to determine whether there is existing information regarding benthic habitat and coral colonization of pilings already available.

I have attached the vessel strike avoidance and reporting guidelines developed by NMFS. These guidelines are applicable for all vessel operations related to the construction and operation of the dock. I sent the Sea Turtle Construction Conditions as part of my October 3, 2012, e-mail message regarding the project, which should be incorporated in the construction methods for the project.

We also discussed other special conditions/measures to avoid potential impacts to ESA resources that should be incorporated in the project (in addition to the vessel strike and construction guidelines). However, other conditions related to the projection of critical habitat or ESA-listed coral colonies may also need to be incorporated in the project depending on the benthic habitat and coral colonization of the pilings once that information is available. Measures to reduce the potential for impacts to ESA resources as part of the project that we discussed on January 9 include:

1. the use of a floating platform or other measure to receive and contain demolition and construction debris and keep it from entering waters of the bay during all demolition and construction operations and the regular upland disposal of these materials in a confined upland site
2. the use of turbidity barriers or other measures to minimize the potential for sediment resuspension and

the transport of resuspended sediment and other materials from the construction site to the bay

3. regular monitoring and maintenance of turbidity barriers to ensure they are effective and that they do not fail, potentially resulting in impacts to sea turtles. Monitoring should also be done during installation of these barriers to ensure no sea turtles are trapped within the barriers when they are installed.

4. as noted above, the incorporation of vessel strike and sea turtle construction conditions in the project operation

5. the selection of anchor and spud points (if applicable) to avoid impacts to benthic habitat such as corals, colonized hardbottom, and seagrass

6. the designation of transit and anchor locations for vessels to be used as part of the project (if applicable) avoid accidental groundings

We also discussed the proposed listing of seven additional coral species that may occur in the project area. Therefore, benthic information and information on coral colonization of the pilings should include information regarding the presence of one or more of these species. FEMA can elect to incorporate avoidance and minimization measures to protect these species in the project as part of a conference with NMFS rather than having to reopen consultation if the project has not been completed when the final listing decision is published should any of these species be located in the project area.

Please let me know if you have any questions regarding the information we need to complete our review of the project, including the minimization measures.

Thank you,
Lee

--

Dr. Lisamarie Carrubba
NOAA Fisheries
Caribbean Field Office, PRD
P.O. Box 1310
Boquerón, PR 00622
787-851-3700
787-851-5588 (fax)

**DEPARTMENT OF HOMELAND SECURITY
FEDERAL EMERGENCY MANAGEMENT AGENCY
CARIBBEAN AREA DIVISION**



P.O. Box 70105
San Juan, PR 00936

	MEETING: Marine Fisheries Requirements for the Retrofit Cargo Pier at Culebra, Project PR-0030, FEMA-4017-DR-PR	DATE: January 9, 2013	ADDRESS/PLACE: FEMA - Region II - Caribbean Area Division	
	NAME (Please Print)	SIGNATURE	AGENCY/TELEPHONE	E-MAIL
1.	Sonny Beauchamp		DHS/FEMA 787-296-3500	Sonny.Beauchamp@fema.dhs.gov
2.	José A. Lebrón-Fuentes		DHS/FEMA 787-296-3500	Jose.Lebtron@fema.dhs.gov
3.	Alwin Alvarado Garcia		DHS/FEMA 787-296-3500	Alwin.Alvaradogarcia@fema.dhs.gov
4.	Nelson Rivera Calderón		Office of the GAR 787-725-9420, ext. 2426	nrivera@ogp.pr.gov
5.	JOSE E. AYALA		787-675-2813	jose.ayala3@fema.dhs.gov
6.	Romel Pedraza		729-8715 ext 3176	rpedraza@prpa.pr.gov
7.	Lorraine de la Cruz		787-729-8715	llebronz@prpa.pr.gov
8.	José O. Sierra Rivera		939-630-8839	jsierra@prpa.pr.gov
9.	Ivelisse Lorenzo-Torres		APPR - 787-729-8715 x 3231	ilorenzo@prpa.pr.gov
10.	Lisamarie Carralbo		NOAA/NMFS 787-551-3700	lisamarie.carralbo@noaa.gov
11.				
12.				