



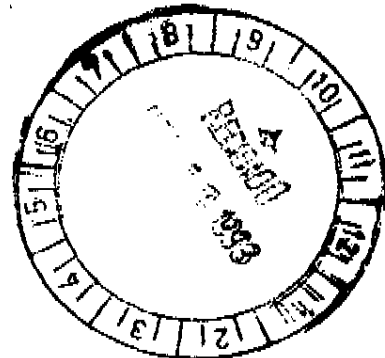
# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Caribbean Field Office  
P.O. Box 491  
Boqueron, Puerto Rico 00622



October 28, 1993

Ms. Iris C. Cuadrado, Director  
Division of Land Use  
Puerto Rico Planning Board  
P.O. Box 41119  
San Juan, PR 00940-1119



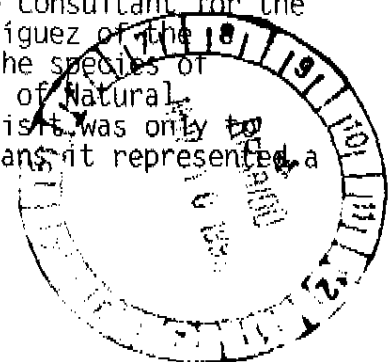
Dear Ms. Cuadrado:

In response to your request for comments on the Environmental Assessment for the project Posada del Coronel in the Barrio Delicias of Culebra, Puerto Rico (Case # 92-77-0845-JPU) and the Public Hearing of October 22, 1993, we continue to believe that the environmental documents are still incomplete.

As mentioned in two previous letters to you concerning the proposed project (copies enclosed), the environmental documents you submitted for our evaluation fail to discuss any measures of erosion control during the construction phase of the project, as well as the capacity of Culebra to support the additional solid waste and sewage. We are concerned about the possible impact of runoff and sedimentation on the adjacent mangrove and seagrass beds, and the animal community that depends on them (black (Avicennia germinans) and red (Rizophora mangle), as well as the threatened green sea turtle (Chelonia mydas)).

Although the document states that a "detailed study of the flora and fauna of the site was done", a reference or attached copy of the study is not included. The document does not mention the methodology used to determine whether or not the endangered Virgin Islands tree boa (Epicrates monensis granti) is present in the proposed project location. To determine the occurrence of this endangered species, it is necessary to conduct intensive surveys at night. A person knowledgeable about the habits and biology of boas, and with experience in searching for these secretive nocturnal animals, is required to conduct surveys. The environmental document does not state that surveys such as described above were conducted.

The document mentions that Ms. Teresa Tallevast, Manager for the Culebra Island National Wildlife Refuge, visited the site with the consultant for the project Mr. Herminio Rodríguez-Morales, and Mr. Julio Rodríguez of the Department of Natural Resources, and did not find any of the species of concern to the Fish and Wildlife Service or the Department of Natural Resources. Ms. Tallevast has informed us that such site visit was only to determine the boundaries of the project site, and by no means it represented a search for the above mentioned species.



We believe the environmental document should discuss the overall impacts and cumulative effects of a project of this magnitude, and the implications that re-zoning for this project could have on the future of Culebra. We question the validity of the environmental document, and reserve favorable recommendation for this project until a more extensive evaluation of the project and its cumulative effect is performed.

Thank you for the opportunity to comment on this issue, and please contact us at 851-7297 for any questions on our comments.

Sincerely,



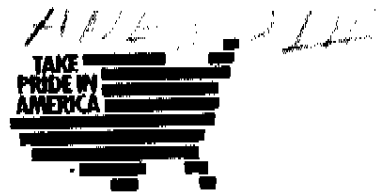
Jorge E. Saliva  
Acting Field Supervisor

cc: EQB, San Juan  
EPA, San Juan  
DNR, Pro-patrimonio  
DNR, CCDA  
COE, San Juan  
Teresa Tallevast, FWS, Culebra  
Municipality of Culebra  
ZM, Architects



# United States Department of the Interior

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Caribbean Field Office  
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Boqueron, Puerto Rico 00622



March 18, 1994

Mr. Elio S. Martínez-Joffre, A.I.A.  
P.O. Box 1473 Old San Juan Sta.  
San Juan, Puerto Rico 00902-1473

RE: Posada del Corone  
Culebra, Puerto Rico  
92-77-0845 JPU

Dear Mr. Martínez:

In response to your comments of December 6, 1993 regarding our previous letters to the Puerto Rico Planning Board, we are providing the following information. First, I would like to apologize for the delay in providing this response.

One of the primary functions of our agency is to provide biological information and recommendations to other governmental organizations that authorize or permit development activities that may impact fish and wildlife resources. Our goal is to ensure that these resources are given consideration and potential impacts are minimized. We do not normally endorse projects unless they have a specific purpose of providing benefits to fish and wildlife resources. The comments you referenced from our letter of December 4, 1992 should not be considered as an endorsement of the project, but only acknowledgement that, at that time, we did not have information that any of the referenced resources would be adversely affected. It should also be noted that the same letter expressed concerns about other resources that might be affected by the project.

After the December 1992 letter was written, we received a request from the Planning Board to review and provide comments on the Environmental Assessment and the Public Hearing. Those comments were provided in the October 28, 1993 letter signed by Mr. Saliva. In that letter, the reference to the two previous letters was with regard to the December 4, 1992 correspondence and another dated September 9, 1993 (copy attached) that reiterated the same concerns.

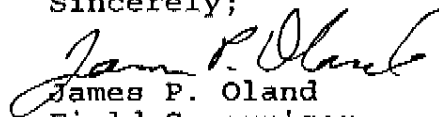
When we receive additional information regarding any activity that may impact our trust resources, we will evaluate that information and provide our best biological evaluation of the impacts to the requesting agency.

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Again, I regret the delay in responding to your letter, but I hope that this clarifies any concern you may have that we had changed our position regarding this project. If you have any further questions, please contact Mr. Saliva or me.

Sincerely;

  
James P. Oland  
Field Supervisor

cc: PRPB, San Juan  
DNR, San Juan  
CCDA, Culebra  
CINWR, Culebra  
Municipality of Culebra  
EQB, San Juan  
EPA, San Juan

