
REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

Recommendations for Additions to or Deletions from
the Coastal Barrier Resources System



**VOLUME 21
PUERTO RICO**

U.S. Department of the Interior



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VOLUME 21

**Recommendations for Additions to or Deletions from
the Coastal Barrier Resources System**

PUERTO RICO

Mapped, edited, and published by the Coastal Barriers Study Group

**United States Department of the Interior
William P. Horn, Assistant Secretary for Fish and Wildlife and Parks**

1988

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PUERTO RICO

INTRODUCTION

The Coastal Barrier Resources Act (CBRA) of 1982 (Public Law 97-348) established the Coastal Barrier Resources System (CBRS), a system of undeveloped coastal barriers along the Atlantic and Gulf of Mexico coasts. This atlas of coastal barriers in Puerto Rico has been prepared in accordance with Section 10 of CBRA (16 U.S.C. 3509), which states:

Sec. 10. Reports to Congress.

(a) In General.--Before the close of the 3-year period beginning on the date of the enactment of this Act, the Secretary shall prepare and submit to the Committees a report regarding the System.

(b) Consultation in Preparing Report.--The Secretary shall prepare the report required under subsection (a) in consultation with the Governors of the States in which System units are located and with the coastal zone management agencies of the States in which System units are located and after providing opportunity for, and considering, public comment.

(c) Report Content.--The report required under subsection (a) shall contain--

(1) recommendations for the conservation of fish, wildlife, and other natural resources of the System based on an evaluation and comparison of all management alternatives, and combinations thereof, such as State and local actions (including management plans approved under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.)), Federal actions (including acquisition for administration as part of the National Wildlife Refuge System), and initiatives by private organizations and individuals;

(2) recommendations for additions to, or deletions from, the Coastal Barrier Resources System, and for modifications to the boundaries of System units;

(3) a summary of the comments received from the Governors of the States, State coastal zone management agencies, other government officials, and the public regarding the System; and

(4) an analysis of the effects, if any, that general revenue sharing grants made under Section 102 of the State and Local Fiscal Assistance Amendments of 1972 (31 U.S.C. 1221) have had on undeveloped coastal barriers.

Under the direction of the Assistant Secretary for Fish and Wildlife and Parks, this report has been prepared by the Coastal Barriers Study Group, a task force of professionals representing the National Park Service, U.S. Fish and Wildlife Service, U.S. Geological Survey, and other Departmental offices.

This volume of the report contains delineations of additions to the CBRS in Puerto Rico that the Department of the Interior recommends to the Congress for its consideration. No units were designated in Puerto Rico when CBRA was enacted in 1982.

BACKGROUND

Puerto Rico is the easternmost island of the Greater Antilles. Mona, Vieques, Culebra, and numerous smaller islands lie immediately offshore from the main island and are part of the Commonwealth. Puerto Rico has an area of 3,435 square miles.

Coastal ecosystems in Puerto Rico include mangroves, coral reefs, beaches, seagrass beds, and salt ponds. Mangroves are very productive ecosystems which support a great diversity of fish, birds, and other wildlife. They are vital feeding, nesting, and roosting areas for several species of birds and important nurseries for fish and shellfish species of commercial importance.

Seagrass beds and coral reefs are other highly productive ecosystems which are extensive in the shallow waters around these islands. Several species of commercially important fishes shelter in coral reefs during the day and feed in grass beds at night. Coral reefs have economic value for recreation and tourism, and provide vital protection for harbors and shorelines because they dissipate wave energies and reduce erosion. Harvestable coral reef resources include fish, spiny lobsters, octopuses, and conchs. The breakdown of corals produces sand for beaches. Reefs and seagrass beds buffer wave energies and promote beach stability.

Industrialization and tourism have placed enormous demands on the coastal resources of

Puerto Rico. Its population now exceeds 3.2 million people. The pressures on the shorelines are evident as marinas, hotels, and condominiums continue to be built. Dredging of bays, mining of beach sand, overfishing, and oil spills have caused other adverse impacts to coastal resources in these islands.

COASTAL RESOURCE MANAGEMENT

Commonwealth Coastal Zone Management

The Coastal Zone Management Program (CZM) in Puerto Rico was approved in 1978 with the Department of Natural Resources as the lead agency. Prior to approval of this program, several Commonwealth and Federal programs already addressed many of the problems of Puerto Rico's coastal resources. The CZM Program extended and improved these programs. The following Commonwealth agencies have responsibility for guiding development:

Department of Natural Resources - responsible for conservation of natural resources (water, wildlife, fisheries);

Puerto Rico Planning Board - guides land use and integrates the programs of Commonwealth agencies;

Regulations and Permits Administration - handles building and use permits;

Environmental Quality Board - establishes environmental policy and pollution control standards, and processes environmental impact statements.

The Coastal Zone Management Program in Puerto Rico established a Coastal Management Unit in the Department of Natural Resources (DNR). This unit has primary responsibility for preparing policies and plans for Special Planning Areas and Nature Reserves and recommends additional areas in these categories. All plans and recommendations go through the Secretary of Natural Resources, who submits them to the Planning Board for incorporation into the Board's Land Use Plan. The Unit also assists the Secretary of Natural Resources in reviewing development proposals.

Regulation of Puerto Rico's coastal resources is an unusual combination of existing Spanish common law statutes enacted during Spain's dominion over the island until 1898, Federal legislation and regulations, and Commonwealth laws largely enacted in the past 10 years. Because the island is only about 35 by 100 miles in size, its coastal environments have long been the focal point of industrial, maritime, urban, military, and commercial activities. As such, they have been altered in proportion to their accessibility. Coastal habitats were first extensively modified for plantation agriculture (especially the clearing of mangroves for sugar cane production), then for industrial development following the introduction of Operation Bootstrap in the late 1940's, and finally for residential expansion as Puerto Rico's population increased.

Commonwealth Law 23, Articles 5-8, June 20, 1972, Organic Act of the Department of Natural Resources. This act authorized the

Secretary of DNR to formulate regulations for the conservation and preservation of forests, plants, and animals; to acquire lands and aquatic habitat for these purposes, especially for the protection of endangered species; to maintain and construct facilities for recreation in these areas; and to regulate off-road vehicles. The law also guaranteed public participation in such processes administered by the Department. An amendment in 1975 refined DNR's responsibilities and its status in relation to the Environmental Quality Board by concentrating most environmental regulatory activity in DNR. Another amendment in 1983 refined public participation, penalties, and responsibilities.

Law 9, Law for Environmental Public Policy approved June 18, 1970, amended May 31, 1973.

Law 9 established a public policy for the conservation of the environment and the Commonwealth's natural resources. It also established the Environmental Quality Board and defined its authority pursuant to Articles 4-6 of Law 158 of June 28, 1968.

Ports Law, amending the Spanish Ports Law of 1880, effective in Puerto Rico in 1886 by Royal Decree. This law established dominion over ports, coastal lands, and waters; established beaches and intertidal waters as public (as well as rivers used as ports and nearshore waters); provided for free access to the sea; regulated anchorages and beach use; and classified ports and provided for their regulation by either the Governor of the island or the Spanish Overseas Ministry (based in Spain). Section 8a established the authority to patrol and enforce these regulations.

Law 136, the Water Law. The water law declared all waters public. It obligated DNR to plan for and to regulate their use, conservation, and development; established penalties; and established the rights and responsibilities of the Authority of Aqueducts and Sewer Systems (AAA locally) and the Authority for Aquifers (Autoridad de las Fuentes Fluviales), as well as the Environmental Quality Board and the Puerto Rico Planning Board. DNR jurisdiction includes all mangroves, subterranean waters, lakes, standing waters, and coastal waters. All are to be regulated for the people of Puerto Rico.

Law for the Prevention of Flooding and the Conservation of Beaches and Rivers. This law transferred responsibility for beaches and rivers from the Department of Public Works to DNR, provided for the control of floodable areas and of extraction of gravel and sand, and provided for the conservation of beaches. It also defined a terrestrial coastal zone and provided for the protection and monitoring of all of the Commonwealth's mangroves. It was amended, largely for consolidation of responsibility in DNR, in June 1972, July 1973, and again in 1975.

Law 3, the Fishing Law of February 25, 1977. Law 3 amended Section 4 of Law 83 of May 13, 1936, Fishing Law of Puerto Rico, to conform with Federal management and jurisdiction and International Law. It extended jurisdiction 12 nautical miles out from the island. Further, it established the responsibility for the regulation of fishing with DNR.

DNR Regulations, Chapter 3, Subchapter 45, Regulation of Fishing. DNR requires a permit in writing from the Secretary of Agriculture and Commerce for a company or corporation before it will permit the construction of dikes or other obstacles that prevent the free passage of fish. DNR also limits the daily catches, mode of fishing and equipment used, and the sale of fish.

Law 144. This law amended Law 132 of June 25, 1968. It expanded and further refined the jurisdiction of DNR to regulate public viewsheds, especially their excavation or similar disruption. It also created a public fund for DNR activities.

Puerto Rico Forest Act, No 133, July 1, 1975. This act provided for the creation and regulation of Commonwealth Forests, delineated unlawful acts in Commonwealth Forests, and established all Commonwealth Forests as refuges for wildlife. It also created a Puerto Rico Forest Service and specified its responsibilities.

DNR Regulations to Control the Extraction, Possession, Transportation, and Sale of Coral Resources in Puerto Rico, October 11, 1979. Under authority conferred to it by the Organic Act of 1972 and the Fishing Law of 1936 and its amendments, DNR adopted regulations for the protection of coral resources in the Commonwealth.

Law 82 of July 7, 1979. This law created the Corporation for the Development and Administration of Marine, Lake, and Flowing Water Resources within the DNR. It recognized Puerto Rico's dependence on marine resources for food and development and put regulations on commercial and industrial activities in coastal zones.

DNR Bylaws to Regulate the Extraction of Materials from the Earth's Crust (Mining Law). This law regulated the granting of permits for the extraction, excavation, removal, and dredging of sand, gravel, stone, clay, or other such components not regulated as economic minerals, on both public and private lands in Puerto Rico. Article 10 recognized deposits of special public interest and defined and regulated them.

Law 145, 1975. This law created a Corporation for the Development of the Mineral Resources of Puerto Rico. It gave the corporation the financial capacity and operational ability to develop the mineral resources of the Commonwealth, subject to the Organic Law for DNR and the Mining Law.

Law 86, July 6, 1985, Off-Road Vehicles Law. This is an addition to Law 141 of July 20, 1960, the Law of Vehicles and Transit in Puerto Rico. Law 86 prohibits the use of off-road vehicles of all kinds on public lands and beaches of Puerto Rico.

Law 66, June 22, 1975. This law established public policy for the use of five parcels on the island (totaling 1,566 cuerdas; 1 cuerda is roughly 1 acre) for recreation (in proposed recreational areas) and conservation.

License for the Use of Federal Lands, August 27, 1976. This agreement between DNR, the Commonwealth, and the U.S. Department of the

Navy defined the use of Federal lands in 12 parcels.

U.S. Navy Lands. All Federal lands are exempt from the CZM Program regulations. Navy lands at Roosevelt Roads Naval Station on the east tip of Puerto Rico, and on Vieques, however, are unlikely to have significant further development without considerable effort expended in securing appropriate permits, especially in mangroves and wetlands under Navy control.

Memorandum of Understanding Regarding the Island of Vieques, October 11, 1983, between the U.S. Department of the Navy and Commonwealth of Puerto Rico. This agreement established a forestry program on Navy lands; provided for continual consultation with DNR on use of Navy lands for economic purposes and on wildlife habitat requirements; established seven lagoonal or mangrove conservation zones; provided for sea turtle, sea mammal, and brown pelican management; continued the Navy's cultural resources preservation program; and established a Management Advisory Committee to assist the Navy in managing natural resources on the island, with representatives from the DNR, Navy, U.S. Fish and Wildlife Service, and the U.S. Forest Service.

Planning Board Regulation 16, Adoption and Regulation of Zones of Tourism Interest, March 30, 1979. This regulation provided for the development and regulation of areas of interest for tourism purposes. It established and classified zones in these areas and provided for their regulation and administration.

Planning Board Regulations for Special Planning Areas. The Bajura Isabela Special Planning Area was delineated in regulations in January 1980. The Planning Board regulates the sand dunes of Jacinto, as well as the mangroves, beaches, and other coastal resources that are not protected by other legislation or are in need of special planning activities because of their exposure to development pressures.

Law 70, Wildlife Law, May 30, 1976. Law 70 regulated the conservation of wildlife, native and migratory birds and animals, and the introduction of other species into Puerto Rico. It also authorized DNR to develop regulations for hunting.

DNR Regulations for Management of Wildlife and Hunting, May 17, 1978. These regulations enumerate dove and pigeon species and waterfowl that can be hunted, and endangered species that cannot. It also lists mangrove forests and lakes where hunting is prohibited (many of which are DNR lands).

DNR Regulations for the Use, Management, and Administration of Recreation Areas under the Jurisdiction of DNR, April 29, 1980. DNR adopted regulations for its recreation areas.

Natural Reserves. The Natural Reserve Program began in 1976. The Planning Board has designated 26 potential reserves, of which about 7 have been formally put into place. At present, these Reserves have no legal protective status and exist largely as planning mechanisms.

Local Actions

Municipalities have no powers to zone their lands or to introduce land-use controls. This power is reserved for the Commonwealth as exercised by the Planning Board. For planning purposes, the coastal zone (as defined by the CZM Program) extends 0.62 miles inland and 3 miles out to sea. The CZM office in Puerto Rico is largely funded by the Federal program and is located within the offices of DNR in San Juan.

Federal Law Specific to Puerto Rico

U.S. Public Law 96205, March 1980. The law extends jurisdiction of the Commonwealth out to 3 marine leagues (10.3 miles). Two bills are currently being considered in Congress to address coastal zone extensions from 10.3 to 12 miles.

Jacobs Bay National Estuarine Sanctuary. Administered jointly by National Oceanic Atmospheric Administration and DNR, this is currently the only such Estuarine Sanctuary in Puerto Rico. It was established to afford Federal protection to a bay undergoing considerable development, yet offering exceptional natural resources.

EXISTING CBRS UNITS

No units were designated in Puerto Rico when CBRA was enacted in 1982.

RECOMMENDED ADDITIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in Puerto Rico be added to the Coastal Barrier Resource System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. However, if any otherwise protected, undeveloped coastal barrier is ever made available for development that is inconsistent with the purposes of CBRA, the DOI recommends that it then be automatically included in the CBRS. A complete discussion of DOI's recommendations concerning otherwise protected, undeveloped coastal barriers appears in Volume 1. Maps of all otherwise protected undeveloped coastal barriers in Puerto Rico appear in the following section.

A table presenting the Department's position on each proposed unit identified in the inventory follows this discussion.

The Department of the Interior's recommendations were developed after full consideration of the many public, State and Federal agency, and Congressional comments on the delineations in the Draft Report released in March 1987. The Commonwealth of Puerto Rico reviewed the 1987 Draft Report and opposes a CBRS expansion into Puerto Rico. The Commonwealth argues that geologically, Puerto Rico is more like the Pacific Coast than the Atlantic Coast and based on its physical characteristics, specifically its steeper topography, it should be excluded from the CBRS. The Commonwealth also argues that fringing mangroves and associated aquatic

habitats should not be considered coastal barriers.

The Commonwealth expressed concerns that the CBRA would interfere with local land-use planning and impose undue regulatory constraints on the territorial government. The Commonwealth also argued that areas that are zoned to restrict development should be considered protected and excluded from the CBRS.

Puerto Rico, unlike the Pacific Coast States, borders the Atlantic Ocean and is included in the geographic scope of the CBRA. Coastal barrier features, whether fronting a coastal plain or a steeper topography, share common characteristics that are outlined in DOI's defining criteria. The coastal barriers identified in Puerto Rico fully meet these criteria. None of the coastal barriers themselves contain steep topography, including those located on the north shore of the island. The DOI is recommending the addition of fringing mangroves to the CBRS because they function as coastal barriers; the protection they provide for the mainland is comparable to that given by sandy barriers. They are also subject to wind, wave, and tidal energies, and to severe flooding and overwash during storms.

The CBRA does not in any way interfere with local land-use planning or regulation. The CBRA is not a regulatory law. In fact, conservation without creation of a new Federal regulatory program was one of the major tenets of the CBRA. A complete discussion of the CBRA and its provisions is contained in Volume 1. Zoning is not a criterion for exclusion from the CBRS as otherwise protected. A complete definition of otherwise protected, taken from the language in the CBRA, also appears in Volume 1.

The Commonwealth made many specific comments on individual proposed CBRS units and provided information about which proposed units were developed or otherwise protected. Using this information, information provided by others, and site visits in 1988, the DOI has redelineated the proposed units in Puerto Rico to exclude all protected and developed barriers. The DOI also identified 3 additional undeveloped unprotected coastal barriers: La Cordillera (PR-08A), Punta Figuras (PR-42A), and Punta Vacía Talega (PR-87). The Commonwealth's other specific concerns about individual proposed CBRS units are discussed in the following section, interspersed with the appropriate maps.

The Department received six other comment letters specifically concerning Puerto Rico. Three of these expressed support for a CBRS expansion into the Commonwealth. The other three provided evidence that Espiritu Santo and Punta Candelero (PR-01 and PR-38 in the 1987 Draft Report) are developed and should not be included in the CBRS. The DOI has visited these sites and agrees they are developed. The Puerto Rican Department of Natural Resources provided information about the protected status of several proposed units. This information has been used (as stated above) to exclude all otherwise protected areas from the recommended additions. Substantive specific comments concerning individual proposed CBRS units are discussed in the following section, interspersed with the appropriate maps.

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN PUERTO RICO

Unit ID Code ^a	Unit Name ^b	Municipality (Municipio)	Shore-line Length (miles)	Total Area (acres)	Fast-land Area (acres) ^c	Recommendation ^d
PR-02	Ensenada Comezon	Rio Grande	3.9	1,598	201	Add to CBRS
PR-03	Rio Mameyes	Rio Grande	1.0	234	52	Add to CBRS
PR-05	Luquillo Spit	Luquillo	1.4	342	145	Add to CBRS
PR-06	Juan Martin Spit	Luquillo	1.0	111	29	Add to CBRS
PR-07	Laguna Aguas Prietas	Fajardo	2.2	462	143	Add to CBRS
PR-08A	La Cordillera	Fajardo	0.4	725	24	Add to CBRS
PR-10	Punta Barrancas	Fajardo	0.4	67	8	Add to CBRS
PR-39	Puerto Yabucoa	Yabucoa	0.4	46	7	Add to CBRS
PR-40	Punta Tuna	Maunabo	0.6	37	13	Add to CBRS
PR-41	Rio Maunabo	Maunabo	0.7	46	18	Add to CBRS
PR-42	Punta Viento	Patillas	1.3	182	40	Add to CBRS
PR-42A	Punta Figuras	Arroyo	3.3	557	59	Add to CBRS
PR-43	Las Mareas	Guayama	1.0	172	43	Add to CBRS
PR-44	Bahia de Jobos	Guayama	1.0	93	32	Add to CBRS
PR-45	Cayos de Barca/ Cayos de Ratones Complex	Salinas	3.1	4,050	108	Add to CBRS
PR-46	Arenal	Salinas	0.9	40	14	Add to CBRS
PR-50	Chardon	Santa Isabel	0.3	11	5	Add to CBRS
PR-51	Rio Descalabrado	Santa Isabel Juana Diaz	1.9	200	54	Add to CBRS
PR-52	Punta Pastillo	Juana Diaz	0.4	65	15	Add to CBRS
PR-53	Bajio de Marea	Juana Diaz	0.3	17	9	Add to CBRS
PR-54	Rio Jacaguas	Ponce	0.5	22	8	Add to CBRS
PR-55	Isla del Frio	Ponce	0.5	265	5	Add to CBRS
PR-56	Punta Cabullones	Ponce	2.1	1,198	76	Add to CBRS
PR-57	Punta Cucharas	Ponce	1.6	325	55	Add to CBRS
PR-59	Punta Ballena	Yauco Guanica	1.6	561	45	Add to CBRS

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN PUERTO RICO (CONCLUDED)

Unit ID Code ^a	Unit Name ^b	Municipality (Municipio)	Shore-line Length (miles)	Total Area (acres)	Fast-land Area (acres) ^c	Recommendation ^d
PR-61	Ensenada las Pargas	Guanica	0.9	150	14	Add to CBRS
PR-66	Cabo Rojo	Cabo Rojo	4.7	958	207	Add to CBRS
PR-68	Boca Prieta	Cabo Rojo	0.3	24	6	Add to CBRS
PR-69	Punta Carenero	Cabo Rojo	4.0	763	60	Add to CBRS
PR-70	Belvedere	Cabo Rojo	0.3	31	15	Add to CBRS
PR-72	Rio Guanajibo	Mayaguez	0.5	85	20	Add to CBRS
PR-75	Espinar	Aguadilla	0.6	60	19	Add to CBRS
PR-76	Punta Agujereada	Aguadilla	0.7	113	65	Add to CBRS
PR-77	Bajura	Isabela	0.4	67	25	Add to CBRS
PR-78	Guayabos	Isabela	0.5	35	22	Add to CBRS
PR-79	Penon Brusi	Camuy Hatillo	1.9	328	83	Add to CBRS
PR-80	Punta Maracayo	Hatillo	0.6	43	11	Add to CBRS
PR-81	Puerto de Arecibo	Arecibo	0.5	73	20	Add to CBRS
PR-83	Tortuguero	Manati Vega Baja	1.5	1,489	133	Add to CBRS
PR-84	Punta Garza	Vega Baja	1.0	638	32	Add to CBRS
PR-00	Punta Boca Juana	Dorado Toa Baja	0.6	59	11	Add to CBRS
PR-87	Punta Vacia Talega	Carolina Loiza	<u>6.1</u>	<u>5,144</u>	<u>522</u>	Add to CBRS
Total	- CBRS as Recommended		56.9	21,486	2,473	

^aUNIT ID CODE - The Commonwealth initials and a number identifying each proposed unit.

^bUNIT NAME - A provisional name based on a prominent local feature.

^cFASTLAND AREA - This acreage is a rough estimate of the portion of the total area that is above the mean high tide line (i.e., the non-wetland area). It is a very general representation of the potentially developable land.

^dRECOMMENDATION - A brief explanation of the Department's recommendations to Congress. For more detailed explanations, see the following section. Abbreviations: FWS = Fish and Wildlife Service, NPS = National Park Service, CBRS = Coastal Barrier Resources System.

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subject to a comprehensive and centralized system of land use regulation imposed by the Commonwealth.

B. Local Land Use Regulation

The legal system of Puerto Rico is partly derived from Spanish law and this results in a far more centralized system of control than is found in other locations in the United States. In particular, almost all land use planning and regulation is done by the Commonwealth rather than local governments. Also, the Commonwealth's land use regulations are far more comprehensive than those of most states on the mainland and apply even to small projects.

As a result of this centralized and comprehensive regulatory scheme, any significant projects in the coastal area will be subject to full evaluation based on consideration of their potential impacts on the welfare of the entire island. Unlike the mainland, there is no risk that a coastal town with strong local development pressures can approve a project despite its overall harmful effects on other areas. Accordingly, there is far less justification for federal oversight than there is for comparable locations on the mainland.

II. Individual Characteristics of Proposed Sites

For the reasons explained above, Puerto Rico should be excluded entirely from the CBRS system. In addition to the general characteristics defined above, however, there are specific characteristics of many of the proposed additions that would make them inappropriate for inclusion in the CBRS even if the CBRA were generally applicable to Puerto Rico. These individual characteristics are set forth below:

PR-00 - This area lies at the mouth of the Rio De La Plata. The U.S. Army Corps of Engineers has completed a survey of this area and has recommended a flood control project, the last 2,000 feet of which would lie within this unit, which would benefit thousands of families and hundreds of businesses located up-river. The designation of this area should not be allowed to interfere with completion of this flood control project.

PR-01 - A hotel, marina and residential community has been approved for construction on this site and work has already begun on excavations for the project. As a condition of this approval, all mangrove swamps have been preserved and

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special habitats for sea birds are being developed. Accordingly, the section of this unit outside of the mangrove swamp is a developed area and is excluded from the CBRS by 16 U.S.C. § 3502(l)(B)(i). The mangrove swamp section of this unit, which is apparently the primary reason for the proposed addition to the CBRS, is already adequately protected under Commonwealth law.

PR-02 - This area includes two small peninsulas, Punta Miquillo and Punta Picua, as well as some wetlands. A residential project is already under construction on Punta Miquillo while Punta Picua has already been equipped with infrastructure for development, including water, electricity, and a sewage treatment plant on its eastern border. Accordingly, these peninsulas should be regarded as developed and excluded from the proposed CBRS. The remaining areas of this proposed unit, which are composed of wetlands, have been zoned to prevent all development and thus are adequately protected.

PR-04 - This proposed area is part of a public beach, which is owned by the Commonwealth of Puerto Rico and reserved for public recreational use. The area is therefore excluded from the CBRS under 16 U.S.C. § 3502(l)(B)(ii).

PR-05 and PR-06 - These units provide examples of the counterproductive nature of the proposed CBRS additions. A planned regional trunk sewer which will connect the town of Luquillo with the regional treatment plant crosses this area. The sewer would significantly benefit the environment of Puerto Rico, but its funding could be jeopardized by the designation of these areas as part of the CBRS.

PR-08 - Part of this unit is owned by the Commonwealth and reserved for the official beach residence of the Governor of Puerto Rico. As such, it is reserved under Commonwealth law primarily for recreational use and is, thus, excluded from the CBRS under 16 U.S.C. § 3502(l)(B)(ii).

PR-09 - This unit is protected under Puerto Rico law. It is zoned PR, which means no development at all is permitted and that access to the area is limited to scientific investigations and other important reasons. Accordingly, this area is excluded from the CBRS under 16 U.S.C. § 3502(l)(B)(ii), as an area set aside under local law primarily for wildlife refuge, sanctuary and natural resources purposes.

PR-10 - This area is already zoned as a mangrove swamp and all development is prohibited. The area is thus

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protected under Commonwealth law and inclusion in the CBRS is unnecessary.

PR-38 - All of the infrastructure for development, including sewers and other utilities, are already in place on this unit and over 100 residential units are already under construction. This area is therefore a developed area and is excluded from the CBRS by 16 U.S.C. § 3502(l)(B)(i).

PR-39 - This unit has more than one residential unit per five acres and is thus a developed area which is excluded from the CBRS by 16 U.S.C. § 3502(l)(B)(i). In addition, it is part of the industrial harbor of the Yabucoa Sun Oil Company.

PR-40 - This unit has numerous residences on it with a density of more than one man-made structure per 5 acres. It is therefore a developed area and excluded from the CBRS by 16 U.S.C. § 3502(l)(B)(i).

PR-43 - A considerable section of this area along the coast has been excluded by the Department because it is clearly a developed area with both residential and industrial buildings. The effect of the proposed gerrymandered configuration will be to concentrate development within the excluded area along the coast and will thus be more environmentally detrimental than excluding the entire area.

PR-45, PR-47, PR-50, PR-52, PR-53, PR-55, PR-57, PR-58, PR-59 and PR-63 - These units are zoned to prevent development and are thus adequately protected under Commonwealth law.

PR-67 and PR-68 - These units each have a shoreline length of less than 0.25 miles which is the minimum length specified by the Department for adding units to the CBRS. See United States Department of the Interior, Undeveloped Coastal Barriers: Final Environmental Statement, at p. II-11 (1983).

PR-81 - The western edge of this area is a public beach and is thus excluded from the CBRS, under 16 U.S.C. 3502(l)(B)(ii), as an area set aside under Commonwealth law for recreation. The eastern edge of this area interferes with developed port facilities.

PR-84 - Most of this area lies within a floodway, in which no development is permitted. The area is thus adequately protected under commonwealth law.

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PR-86 - This unit is owned by the Commonwealth of Puerto Rico and is reserved for use as a public beach. It is therefore excluded from the CBRS under 16 U.S.C. § 3502(l)(B)(ii).

Conclusion

For all of the foregoing reasons, no areas in the Commonwealth of Puerto Rico should be added to the CBRS. Any questions concerning this letter may be directed to the undersigned.

Sincerely,

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OTHER GENERAL COMMENT LETTERS CONCERNING PUERTO RICO

1399



DEPARTMENT OF NATURAL RESOURCES

JUN 12 1987

Coastal Barrier Study Group
National Park Service
U.S. Department of the Interior
P.O. Box 37127
Washington, D.C. 20013-7127

Gentlemen:

Responding to your Notice of Availability, published in the Federal Register of 25 March 1987, a request from the Honorable Jaime Fuster, Resident Commissioner for Puerto Rico, dated 31 March 1987, and a request from the Office of the Governor, dated 5 May 1987, and after a careful review of the recommendations of the Department of the Interior with respect to expansion of the National Coastal Barriers System, I am pleased to submit the following comments:

1. The recommendation related to proposed unit PR-12 in Culebra should be modified to read as follows: "Add to CBRS, except eastern and western shores of Flamenco Bay"; see attached map.
2. The recommendation related to proposed unit PR-29 in Vieques should be modified to read as follows: "Commonwealth protected; no further consideration".
3. The recommendation related to proposed unit PR-45 should be modified to read as follows: "Add eastern 1/4 and Cayos de Barca to CBRS; western 3/4 Commonwealth protected, no further consideration"; see attached map.
4. The recommendation related to proposed unit PR-48 should be modified to read as follows: "Commonwealth protected; no further consideration".
5. The recommendation related to proposed unit PR-58 should be modified to read as follows: "Commonwealth protected; no further consideration".
6. The recommendations related to proposed units PR-63 and PR-64 should be modified to read as follows: "Commonwealth protected; no further consideration".
7. The recommendation related to proposed unit PR-67 should be amended to read as follows: "Commonwealth protected; no further consideration".

Mulder Plaza Ave., Stee 3, San Juan, P.R. / Box 5007, P.O. de Tierra, P.R. 00906

Coastal Barrier Study Group

Page 2

8. The recommendations related to proposed units PR-72 and PR-73 should be modified to read as follows: "Add to CBRS, except State Highway PR-102".
9. The recommendation related to proposed unit PR-83 should be modified to read as follows: "Add to CBRS, except State Highway PR-686"; see attached map.
10. The recommendation related to proposed unit PR-87 should be modified to read as follows: "Add to CBRS, except western 1/2 Commonwealth protected, no further consideration"; see attached map.

The above comments reflect suggestions of the Puerto Rico Planning Board as well as those of the technical staff of this Department related to the preliminary recommendations for the inclusion of the Commonwealth of Puerto Rico in the National Coastal Barrier System.

I am looking forward to an early positive action on this matter by the 100th Congress.

Cordially yours,

Justo A. Méndez,
Secretary

Enclosures

Copies to: Resident Commissioner
Office of the Governor
Planning Board
Environmental Quality Board

1673



DEPARTMENT OF NATURAL RESOURCES

November 10, 1987

Mr. Frank B. McGilvrey
Coordinator
Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
P.O. Box 37127
Washington, D.C. 20013-7127

Dear Mr. McGilvrey:

One June 12, 1987, the Department of Natural Resources filed its comments on the Department of the Interior's draft Report to Congress: Coastal Barrier Resources System; Proposed recommendations for Additions to or Deletions from the Coastal Barrier Resources System ("Draft Report"). The main focus of our June 12 letter was the identification of specific sites proposed for inclusion in the Coastal Barriers Resources System ("CBRS") that the Department of Natural Resources believed would be inappropriate for inclusion. In that letter, however, the Department may have inadvertently given the impression that the Commonwealth of Puerto Rico supports the proposal to extend the CBRS to Puerto Rico.

At the time of the June 12 letter, the Commonwealth had not yet formulated a complete position in this issue. Subsequently, after careful and thorough review and consultation with all relevant agencies, the Commonwealth determined that the addition areas in Puerto Rico to the CBRS would not serve the public interest. This position was set forth in a letter of July 31, 1987 from attorneys for the Commonwealth to the Coastal Barriers Study Group. The July 31 letter represents the official position of the Commonwealth. To the extent that the June 12 letter may have implied a contrary position, it is superseded by our subsequent submission.

We regret any inconvenience that this misunderstanding may have caused.

Sincerely,
Justo A. Méndez
Secretary

Mulder Plaza Ave., Stee 3, San Juan, P.R. / Box 5007, P.O. de Tierra, P.R. 00906

1666

COMITE INTERUNIVERSITARIO PARA ASUNTOS AMBIENTALES DE PUERTO RICO
P.O. BOX 204
ESTACION 6
PONCE, PR 00732

September 2, 1987

Mr. William T. Horn
Assistant Secretary for
Fish and Wildlife and Park
US Department of the Interior
18th and C Street
N W Washington, DC 20240

Dear Sir:

I am writing on behalf of the Puerto Rican Interuniversity Committee for Environmental Affairs. Included herein is a list of the persons that constitute the Governing Board of the Committee.

We are highly concerned with the government of Puerto Rico recent request to be excluded from the Coastal Barriers Resources System.

The reasons offered by the government are most incredible and if we may respectfully add, laughable.

The environmental concern and sensitivity of this government is infamous. The record is available for all to see.

At present we are facing the biggest development effort ever seen in Puerto Rico in coastal and other sensitive areas. And at many instances with the Governor's public endorsement (i.e. Club Med at Guánica).

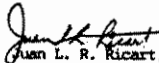
The arguments of Mr. Copaken that "there is no risk" in Puerto Rico, and that "the island is different" and that "the areas will be subject to a comprehensive and centralized system of land use regulation imposed by the Commonwealth"... are an insult to our intelligence. For years now we have been witness to a lack of vigilance and enforcement by the Natural Resources Department. The Commonwealth has been unable to protect Culebra, Boquerón, Joveras, Punta Picota, Talaga, Joyuda, Parguara and other mangrove systems; and most Puerto Ricans forests are a miracle of survival.

What we really have is a government anxious to have the liberty and power to develop and turn our island in one huge floating industrial and urban complex.

Mr. William T. Horn
Page 2
September 2, 1987

This Committee respectfully request that the Government of Puerto Rico petition be denied. We are available to offer a more extensive commentary if needed.

Very truly yours,


Juan L. R. Ricart, Professor
Coordinator for the Committee

med

Enclose

cc: Mr. Done Hodel
Secretary of the
US Department of Interior

Mr. Frank Dunkle
Director
US Fish and Wildlife Service

Mr. James Pulliam
Director Region Fourth
US Fish and Wildlife Service



Working for the Nature of Tomorrow
NATIONAL WILDLIFE FEDERATION
1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

1282

Coastal Barriers Study Group
Department of the Interior
National Park Service
P. O. Box 37127
Washington, D.C. 20013-7127

RE: Comments on the Coastal Barrier Resources Act--Section 10 Draft Report to Congress, 52 Federal Register 9618-9619

Dear Sir or Madam:

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society are writing in response to the Department of the Interior's Federal Register Notice of March 23, 1987 soliciting comments on the Draft Report to Congress: Coastal Barrier Resources System--Executive Summary.

Our organizations have a longtime interest in the conservation of coastal barriers. The Natural Resources Defense Council was the founding organization of the Barrier Islands Coalition in 1978. Likewise, the National Wildlife Federation, the Coast Alliance, and the Oceanic Society became members of that coalition in 1979 to help seek protection of coastal barriers.

Our organizations have led efforts to pass legislation which would conserve the natural resources of coastal barriers--first, the flood insurance prohibition in the Omnibus Reconciliation Act in 1981 and then, the Federal financial prohibition in the Coastal Barrier Resources Act (CBRA) in 1982. We continue to support the goals of CBRA and expansion of the Coastal Barrier Resources System (CBRS) throughout the United States and its territories. The federal government should not be subsidizing development in hazardous areas which destroys productive coastal ecosystems, endangers the lives and properties of shoreline residents, and costs federal taxpayers millions of dollars each year in flood insurance claims and disaster relief.

The need for an expanded Coastal Barrier Resources System in which federal development subsidies are prohibited is becoming increasingly critical in light of the projected rise in sea levels due to global warming. As water levels rise, so will the costs of protecting existing structures, the damages from erosion and flooding, and the risk to human life and property. Unfortunately, however, development in these unstable coastal areas continues to grow at a frightening pace. We feel strongly, therefore, that it is essential that the Department recommend maximum expansion of the System to include the eligible areas on all of America's coasts

before these sites are irrevocably committed to development. An appendix of specific comments on additions to and deletions from the System follow our general comments.

PROPOSED RECOMMENDATIONS FOR ADDITIONS TO
OR DELETIONS FROM THE CBRS

We support the Department's recommendation to expand the definition of a "coastal barrier" to include landforms which function as coastal barriers in protecting the mainland and adjacent aquatic habitats, even if they are not composed of unconsolidated sediments as are barriers in the traditional definition. Use of this expanded definition in delineating CBRS units is consistent with the conservation goals of CBRA and would allow for the inclusion of such new geological formations as undeveloped beach rock, cemented dunes, fringing mangroves and associated coral reefs, cheniers, discontinuous outcrops of bedrock, and coarse glacial deposits. Since these areas serve the same function as coastal barriers and are as vulnerable to development pressure, sea level rise, and storm damage as traditionally-defined coastal barriers, it is appropriate that they also be protected within the System.

APPENDIX

COMMENTS ON SPECIFIC COASTAL BARRIER AREAS

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society endorse the inclusion of all undeveloped coastal barriers identified by the Department of Interior in the March 1985 inventory, as well as some additional areas mentioned below. Following are our comments on some of the specific areas.

Puerto Rico

As with the Virgin Islands, we are very pleased with the proposed protection of Puerto Rico's rich coastal resources within the System and support the inclusion of all 10,182 acres into the CBRS.

1563

VIA EXPRESS MAIL

July 29, 1987



J. Raymond Watson
President

Chief, Coastal Barrier Study Group
U. S. Dept. of the Interior
National Park Service
P. O. box 37127
Washington, D. C. 20013-7127

Sir:

By fortuitous circumstance, we have become aware, COB July 28, 1987, that it is intended to extend coverage of the U.S. Coastal Barrier Resource System Act to Puerto Rico and, specifically, include 268 acres at Candelero Point within the Palmas del Mar Resort Community.

We have been further informed that such coverage by the Act of Candelero Point would, among other effects, preclude the obtention of flood/disaster insurance for properties within that area, an impediment that would, in turn, in practical terms impede development of that site.

Since, according to our source, the deadline to present comments to you has been set for COB July 30, 1987, we have obviously not had the time to ascertain further details, get a more complete picture, inform ourselves of the procedure to be followed, and conduct the necessary research and studies that would assist in defining our position.

At this time, therefore, the Palmas del Mar Company can only express grave concern over the action intended by you and, through this letter, file our objection to the specific coverage of Candelero Point at Palmas del Mar.

Since 1974, the Palmas del Mar Company has been developing the Palmas del Mar Resort Community in accordance with the Master Plan approved by the Puerto Rico Planning Board, following acceptance of a full and detailed Environmental Impact Statement that discussed, among other aspects, the coastal conditions along the seashore frontage of our property. A substantial portion of the Candelero Point site, identified as Beach Village and Candelero Village in the Master Plan, has already been developed with a 102-room Hotel and

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development is already completed and the remainder is either under construction or being readied for construction.

The Draft Report and LEIS recommend, *inter alia*, that Candelero Point be added to the Coastal Barriers Resources System under The Coastal Barrier Resources Act of 1982, 16 U.S.C. §3501 et seq. ("the Act"). As discussed below, this recommendation, if adopted, would cause severe injury to Palmas del Mar and Puerto Rico. In preface to discussion of this issue, however, we note at the outset that the recommendation ignores the plain language of the Act in several respects.

The Act limits the system to the Atlantic and Gulf Coasts of the mainland, 16 U.S.C. §3503(a), where coastal barriers require special protection. They require such protection because they are composed of unconsolidated sediment, 16 U.S.C. §3502(1)(i), and are especially vulnerable to degradation. As noted above, Candelero Point is located on the Caribbean coastline of Puerto Rico -- far removed from the Atlantic or Gulf Coasts of the mainland. Moreover, the Candelero Point coastline is composed and protected by consolidated/cemented minerals, and is further protected by an offshore coral reef, conditions that simply do not obtain in the geographic areas within the scope of the Act, and that obviate the necessity for coverage by the Act. In addition, the recommendation to include Candelero Point within the Act's coverage is made notwithstanding the language of 16 U.S.C. §3502(1)(b)(i), which excludes developed areas such as Palmas del Mar from the Coastal Barriers Resources System.

Palmas del Mar is certainly cognizant of the environmental concerns that underlie the Coastal Barriers Study Group's recommendations, and endorses the objectives of preservation and control of the environment. In its development of Candelero Point, Palmas has respected environmental values, going to great lengths to preserve the environmental integrity of the coastline and adjacent areas. Not only does Puerto Rico law require as much, it is good business. As a matter of law, issuance of requisite permits to Palmas by the Puerto Rico Planning Board and other affected Commonwealth agencies, enabling Palmas to proceed with development of Candelero Point, constitutes certification by those agencies that Palmas has complied with controlling Commonwealth laws and regulations respecting environmental protection. As a business matter, for Palmas to disturb the beauty of Candelero Point or create risk of degradation to the shoreline would be economically self-defeating as it would jeopardize the very asset Palmas has

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worked so hard to create. For these reasons, Palmas del Mar urges that the Department of Interior remove Candelero Point, Huisca, Puerto Rico, from its recommendations for additions to the Coastal Barrier Resources System.

II. Candelero Point is an Integral Part of the Palmas del Mar Master Plan

Palmas del Mar, located on the southeast coast of Puerto Rico, is a 2,750-acre property containing a destination resort complex and residential community. The resort consists of a 102-room hotel and adjacent 6,000 square foot executive convention center, a 23-room luxury inn, 5 restaurants, an 18-hole golf course, 20 tennis courts, 3 1/2 miles of beach, 4 swimming pools, an equestrian center, a sailing center and a marina. The residential community consists of houses, townhouses and condominiums. All of the Palmas resort facilities are available to Palmas property owners and their guests. In accordance with the Palmas del Mar Master Plan, certified by the Commonwealth of Puerto Rico and last amended in 1978, land uses and densities have been established for every developable parcel within Palmas. Palmas has approvals from the Puerto Rico Planning Board for 8,335 condominiums and 3,256 homesites.

The Master Plan itself was developed with profound respect for the ecological value of the land. The Plan is highly responsive to topographic and soil conditions, reserving the best sites for higher density hotel, condominium and townhouse construction. Design and construction parameters established by deed restrictions limit the height of single family home construction to 36 feet, of which no more than 24 feet can be uninterrupted. All other structures must be lower than coconut palm tree height. Design must be approved by the Palmas del Mar Architectural Review Board and by the Permits and Regulations Administration of the government of Puerto Rico.

¹Candelero Point's designated Unit ID Code Number for purposes of DOI's report is PR-38.

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Forty percent (40%) of the acreage at Palmas has been devoted to green belts, recreation areas, bicycling and hiking trails, a tropical forest and a botanical park. The Master Plan has received praise from respected journals such as the Architectural Record and Urbanismo y Planificación, Latin America's most recognized planning publication. The Plan has been cited by the Secretary of Natural Resources of Puerto Rico as a model for development projects on the island. A map of the Master Plan is appended hereto as Exhibit 1.

As shown on the exhibit, the area that DOI proposes to include within the protected zones under the Coastal Barriers Act, embracing the whole of Candelero Point and contiguous areas (PR-38), is outlined in red. Both geographically and conceptually, Candelero Point, two aerial photographs of which are attached as Exhibits 2 and 3, is the centerpiece of Palmas del Mar. Its successful development is critical to the ultimate success of the resort community as a whole. A portion of Candelero Point has already been developed. Most of the remainder of the Point is either under construction or has been readied for construction. DOI's recommendation that Candelero Point be included within the protected zones under the Coastal Barriers Act jeopardizes the development of Candelero Point and thus the economic viability of Palmas del Mar as a community. The section that follows describes the development that has occurred and that is in progress at Candelero Point. The next succeeding section explains the economic threat posed by DOI's recommendations.

III. A Portion of Candelero Point Has Been Developed and Most of the Remainder of the Point is Either Under Construction or Has Been Readied for Construction

Attached to this letter as Exhibit 4 is a map of Candelero Village, which embraces most of the property within PR-38 as proposed by DOI. Candelero Village contains ten separate developments, one of which has been fully developed and the remainder of which are either under construction or have been readied for construction. All have received necessary approvals from the appropriate agencies of the Commonwealth of Puerto Rico. Six of these developments front the beach on Candelero Point. Under Puerto Rico law, however, twenty meters between the beach and the developments are reserved as a protected set-back in which no construction can take place. This set-back contains coconut palm and sea grape trees that serve as a natural buffer and beautify the topography.

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Starting at the southeast corner of the Village, and moving north along the coastline and then back in a counterclockwise direction, the developments are as follows:

A. Crescent Cove I (outlined in red): This eight-acre development, popularly known as "Crescent Cove", consists of 101 fully developed residential units in 4 buildings averaging 1,500 square feet per unit. It has been sold out at a gross sellout price of \$19,050,000.00.²

B. Crescent Cove II (outlined in blue): This development, comprising approximately 10 acres, is popularly known as "Crescent Beach." It will consist of 156 residential units in 8 buildings averaging 1,800 square feet per unit, with a projected sellout price of \$34,650,000.00. The land for Crescent Beach has been cleared and is being leveled. Foundations will be poured commencing June, 1988, with completion of that stage scheduled for December, 1988. The project is due to be completed in the spring of 1990.³

C. Crescent Cove III (outlined in pink): This development is popularly known as "Sailors Cove." It comprises

²Crescent Cove is near the southeast corner of PR-38, north of hole #4 on the Palmas del Mar golf course. The southwest edge of Crescent Cove is on the eastern side of Candelero Road. Its border runs southeast approximately 80 meters; then easterly approximately 140 meters to the set-back; then north along the set-back following the line of the beach approximately 160 meters; then west approximately 170 meters along the beach pedestrian access road to Candelero Point; then south approximately 100 meters to the point of origin.

³The southwest corner of Crescent Beach begins just north of Crescent Cove and east of Candelero Road; then the border goes east approximately 170 meters along the pedestrian access road to the protected set-back; then north approximately 165 meters along the line of the set-back parallel to the beach; then west approximately 170 meters to Candelero Road; then south along Candelero Road approximately 170 meters to the point of origin.

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approximately 7.5 acres and will contain 8 buildings with 186 residential units. Clearing and grubbing have been completed and construction is scheduled to commence in January of 1989, to be completed in April, 1990.^{4/}

D. Hotel and Crescent Cove IV (outlined in green): Palmas del Mar plans to construct a major destination resort hotel that will be the centerpiece of the resort community. The hotel, which will have 400-500 rooms, will be situated behind Candelero Point. The entire tract is approximately 29 acres.^{5/}

A letter of intent with Ritz-Carlton Corporation was signed in October, 1987, and the process for design and financing has been underway since that date. The Ritz-Carlton Hotel project at Candelero Point has received the support of the Governor of Puerto Rico and support and approval of the key Commonwealth agencies, including the Puerto Rico Planning Board, Permits Bureau and Tourism Development Department.

^{4/}The southwest corner of Sailors Cove is on the northeast corner of Crescent Beach; its border then goes east approximately 170 meters along the pedestrian access road to the protected set-back; then north and slightly east approximately 150 meters along the line of the beach at the protected set-back to the pedestrian access to the beach; then due north 90 meters (along the south edge of the Candelero Point Hotel property); then northwest 130 meters to Candelero Road; then southeast along the east side of Candelero Road 150 meters to the point of origin.

^{5/}The southwest corner of the hotel and cabana property is at the northwest corner of Sailors Cove; the border then goes south and east along the northern border of Sailors Cove, approximately 150 meters, then south 90 meters to the protected set-back at the beach; then east 200 meters following the line of the beach at the set-back; then around Candelero Point in a northeast direction 90 meters; then along the beach line in a northern and slightly western direction 410 meters; then due west 170 meters to Candelero Road; then due south along Candelero Road 270 meters to the point of origin.

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E. Crescent Cove V (outlined in light blue): This tract, situated north of the hotel and cabana site, comprises 7.5 acres. The southern corner lies at the northwest corner of the hotel and cabana site. The border then goes east 170 meters to the protected set-back from the beach; then north and slightly west along the line of the beach 150 meters; then west and slightly north 140 meters to Candelero Road, then south along Candelero Road 210 meters to the point of origin.

F. Crescent Cove VI (outlined in orange): This tract comprises 4 acres. The southwest corner lies at the northwest corner of Crescent Cove V. The border then runs easterly and slightly south 140 meters along the northern border of Crescent Cove V to the protected set-back from the beach; then due north 150 meters along the line of the beach; then west and slightly north 60 meters to Candelero Road; then south-southwesterly along Candelero Road 180 meters to the point of origin.

G. Fairlakes I (outlined in brown): Fairlakes I is a six-acre development consisting of 4 buildings with 48 residential duplex units, 12 per building. The land has been cleared and prepared; the building foundations and walls have been poured; and all electrical conduits and major mechanical work have been installed. The remaining structural elements will be poured within several weeks. Construction will be completed by the autumn of 1988, with a sellout price projected at \$8,725,000.00.^{6/}

^{6/}The southeast corner of Fairlakes I is on the west side of Candelero Road, southwest of the southwestern corner of Crescent Cove. From there the border goes north following Candelero Road 200 meters; then northwest along a lake (to be built) approximately 230 meters; then southwest 100 meters along the eastern perimeter of the golf course at hole #8; then southeast 110 meters along the eastern perimeter of the golf course at hole #8; then south 190 meters along the eastern perimeter of the golf course at hole #8; then east 15 meters to the point of origin at Candelero Road.

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H. Fairlakes II (outlined in yellow): Fairlakes II will have 52 residential units in 5 buildings on 5 acres. The site has been cleared and backfilled and the foundation will be poured starting in August, 1988. It is scheduled for completion in October, 1989, with a sellout projected at approximately \$10 million.^{7/}

I. Fairlakes III and IV and Commercial Center (outlined in black): Construction on this fourteen-acre lot, which will include 200 units and a commercial center serving the community, is scheduled to begin in January of 1989.^{8/} Construction of the project will be completed by November, 1990.

J. Golf Club (outlined in purple): Palmas del Mar intends to build a new golf club facility including locker rooms, restaurant, bar, showers and pro shop at Candelero Road on the northeast property boundary of Fairlakes III and IV. The golf club will take approximately 1,600 square meters; an adjacent parking lot and street will consist of 5,128 square me-

^{7/}The southeast corner of Fairlakes II is at the northeast corner of Fairlakes I on the west side of Candelero Road. The border then goes north along Candelero Road 130 meters; then northwest 220 meters to the east side of the golf course at hole #1; then south (and slightly west) 80 meters along the east side of the golf course at hole #1 to the northwest corner of Fairlakes #1; then south (and slightly east) along the artificial lake approximately 230 meters on the north side of Fairlakes I to Candelero Road.

^{8/}Its border begins at Candelero Road, at the northeast corner of Fairlakes II. Its border then goes northeasterly along Candelero Road 280 meters to the intersection with the hotel property lines and the Sailors Cove property line; then due north 330 meters along Candelero Road; then due east from Candelero Road 40 meters to the golf course; then around the perimeter of the golf course in a southwesterly direction 380 meters up to the northwest corner of Fairlakes II; from there southeast approximately 220 meters to Candelero Road on the north side of Fairlakes II.

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ters and a surrounding area of greenery and vegetation will consist of 9,357 square meters.^{9/}

K. Miscellaneous: The proposed PR-38 also includes approximately 40 acres of the existing Palmas del Mar golf course that has been developed and in continuous operation since 1973. That area embraces holes #1, 2, 3, 4, 8, 9, 10 and 18.

IV. DOI's Recommendations Threaten the Economic Viability of the Palmas Resort Community and May Cause Broader Injury Throughout the Island

Tourism is of major importance to Puerto Rico. In calendar year 1986 it contributed \$246.9 million, net, to the economy, representing 1.9 percent of the total net income for the Island for that year.^{10/} According to figures for the 1987 fiscal year, hotels enjoyed a 12.9% increase in room registrations from the previous fiscal year, to 855,051. Occupancy in hotels was 71.9%, 9.5% higher than the year before. Cruise passengers were up by 30.2% to 584,429. A total of 1.874 million visitors came to the island in fiscal year 1987 and spent an estimated \$857 million. *Caribbean Update*, Vol. 3, No. 11, Dec. 1987, p. 15. Obviously, tourism brings direct revenues to the hotels and other lodging establishments as well as the restaurant and transportation industries that serve the tourists. Suppliers of goods and services to these industries receive indirect

^{9/}From its starting point on the northeast property boundary of Fairlakes III and IV, the new border will go due east 40 meters to the edge of the golf course at green #9; then around the perimeter of green #9 90 meters in a western and southern direction; from there north and slightly east 230 meters to the boundary of the green at hole #18; from there around hole #18 in a northeast direction 140 meters to Candelero Road; from there south and slightly west 190 meters along Candelero Road to the point of origin.

^{10/}These figures have been obtained from the Tourism Company of Puerto Rico, the government-affiliated entity charged with overall promotion of the tourist industry.

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revenue from tourism. In 1986, 5.5 percent of total employment in Puerto Rico was in the tourism sector.^{11/}

San Juan and its environs have traditionally been the center of the tourism industry in Puerto Rico. During the last several years, however, the Tourism Company of Puerto Rico has made a conscious effort to decentralize the tourist industry throughout the island, stimulating local economies by providing employment and income to the resident populations.

Since its inception, Palmas del Mar, situated on the southeast coast of the island, has been an important component in that plan in at least two ways. First, Palmas when completed -- particularly the hotel convention complex at Candelero Point and an additional golf course and tennis facilities that are planned -- will act as a magnet for tourists from the U. S. mainland. Second, and as important, the facilities will help keep existing businesses in the region, help attract new businesses and encourage local residence on the part of employees of existing and new facilities. The east coast of Puerto Rico is home to approximately 500 major corporations. Among them are affiliates of some of the largest companies in the United States, including Chlorox, Ford Motor Company, General Electric, General Foods, Johnson & Johnson, MacNeil, Squibb, Sun Oil, Wang Laboratories and Westinghouse. The sports, entertainment and convention facilities available to executives and other employees of these companies are a major attraction and provide an incentive to live nearby. The presence of this professional community further fuels the regional economy. The prospect of attracting new industry and residents on the strength of the resort and business facilities at Palmas del Mar suggests greater revenues yet.

Completion of the development at Candelero Point is essential to the ultimate success of the community. The hotel and its attendant operations will act as a magnet drawing visitors from the United States and around the world. It, and to a lesser extent the surrounding condominiums and villas, are the centerpiece of the community. If the hotel is not construc-

^{11/}See fn 10.

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V. Conclusion

With its completion, the Palmas del Mar Resort Community promises to be one of the premier resorts in the Caribbean region. The economic success of Palmas is important to the Humacao region where it is located and to the island of Puerto Rico as a whole, which is heavily dependent on tourism. Were Palmas to fail, the economic injury would be incalculable.

Candelero Point is critical to the success of Palmas. Candelero Point has been conceived as the centerpiece for the entire resort -- its hotel and convention facilities will serve as a powerful magnet for the entire community. A portion of Candelero Point has already been completed, and most of the remainder is already under development. The proposal of the Department of the Interior to add Candelero Point to the Coastal Barriers Resources System under the Coastal Barriers Resources Act of 1982 threatens the further development of Candelero Point, however, by creating an encumbrance to marketability of the hotel and convention center and by depriving retail purchasers of access to flood insurance, thereby diminishing or destroying the marketability of the condominiums.

In making its final recommendations to the Congress, as a matter of law DOI must observe the constraints of the Act. The Act by its terms does not apply to Puerto Rico. Moreover, the Act excludes developed areas from the embrace of the System. These facts alone provide ample ground for Palmas' objections to the recommended inclusion of Candelero Point within the System. In addition, and as a matter of common sense, in evaluating its possible recommendations DOI should balance the injury that will occur in the event Candelero Point is included in the System against the injury that will occur if it is not. The severe economic injury to the people of Puerto Rico, in the event that Candelero Point is included within the System, is evident. On the other hand, the injury that might occur in the event Candelero Point is not included within the System is negligible at worst.

The LEIS clearly enunciates that the Proposed Action, which will severely limit or curtail coastal development, "is expected to contribute to maintaining the natural aesthetic qualities of the beaches, dunes, shrublands, forests, and wetlands of undeveloped coastal barriers." LEIS at IV-15. Much of the development of Candelero Point has already taken place, however. That development and the remaining development

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ted the income of the entire community may well be jeopardized. The failure of Palmas del Mar would have devastating consequences for the local community and to a lesser extent the entire island.

DOI's proposal to eliminate federal supports for Candelero Point -- most notably federally guaranteed flood insurance -- threatens the economic viability of the community in two ways. First, the creation of the protected zone could well lower property values and chill investors in and insurers of the proposed hotel and surrounding development. The financial and insurance community might well conclude that the establishment of a "protected zone" creates an encumbrance to subsequent marketability of the property thereby reducing the value of the property and the willingness of the investment community to finance and insure it at reasonable rates if at all. Second, purchasers of condominiums and villas in fact might be unable to obtain conventional flood insurance at reasonable rates, thereby vitiating the marketability of the units.

The LEIS clearly recognizes the severe economic threat posed to Puerto Rico in the event of inclusion of Puerto Rico in the Coastal Barriers Resources System. As noted in the introduction to the LEIS, at ii and iii, "... the Proposed Action may also result in economic costs to individual owners and developers of the coastal barrier property, especially in ... Puerto Rico ..." Elsewhere, the LEIS observes, "... local communities in Florida, especially the keys, Puerto Rico, and the U. S. Virgin Islands have the greatest potential for experiencing [negative] economic impacts from the Proposed Action." LEIS at IV-19. Confirming Palmas del Mar's concerns regarding insurability, the LEIS candidly acknowledges the "...high risk for lending institutions if disaster assistance and flood insurance [for coastal developments such as Palmas del Mar] are not available from the Federal Government." LEIS at IV-2. Predictably, "[w]here Federal Flood Insurance is not available, private financial institutions are generally unwilling to make loans for developments." Id. That is precisely the dilemma confronting Palmas del Mar and the region in Puerto Rico that is dependent on Palmas, in the event Punta Candelero is included in the Coastal Barriers Resources System.

PORTER, WRIGHT,
MORRIS & ARTHUR

have proceeded with great respect for environmental values because Puerto Rico law and good business sense require as such. Merely by way of example, the shoreline and a twenty meter set-back have been preserved intact. (See Exhibits 2 and 3). Approximately 40% of the entire development has been preserved as green space. No future environmental degradation will occur at Candelero Point because the land-use has already been thoughtfully and carefully planned and executed. Thus inclusion of Candelero Point in the System will work a harm without any corresponding -- much less superseding -- benefit.

For these reasons, Palmas del Mar urges that Candelero Point, PR-38, not be added to the Coastal Barriers Resources System.

Very truly yours,

Charles S. Fax

Luis Guinot, Jr.
Charles S. Fax
Porter, Wright, Morris & Arthur
1233 20th Street, N. W.
Suite 400
Washington, D. C. 20036

Attorneys for the Palmas del
Mar Resort Company

Enclosures

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MORRIS & ARTHUR

1714

GREGORY L. MORRIS, PH.D.
HYDROLOGY & ENVIRONMENTAL ENGINEERING

(800) 723-8008

BOX 3638
SAN JUAN
PUERTO RICO 00908-3638
U.S.A.

March 11, 1988

Mr. Frank McGilvray
The Coastal Barriers Study Group
Dept. of the Interior
National Park Service
P.O. Box 37127
Washington, D.C. 20013-7127

Re: Comments on Coastal Barrier Resources System (CBRS)
Rio Grande, Puerto Rico (unit PR-01)

Dear Sir:

I am writing on behalf of Bahia Beach Plantation, Inc. to object to the proposed inclusion in the CBRS of unit PR-01 identified on the enclosed map (Rio Grande quadrangle). Bahia Beach Plantation, Inc. is the owner of all the upland property identified within unit PR-01; the mangrove area, known as Caño San Luis, is owned by others. Bahia Beach Plantation has initiated the development of its property as a resort area to include both residential and hotel units and associated recreational facilities. There is concern that designation of this area as a part of the CBRS would be detrimental to the activities already underway, and there are also questions concerning the appropriateness of a CBRS designation for this particular property.

We submit that this property should not be included in the CBRS for the following reasons:

1. The property should not be considered undeveloped. Development planning is already in a very advanced stage: financing (including federal participation in some aspects) has already been obtained, water and sewer infrastructure is in place, and most local agency approvals are already in place. Final approval from the Puerto Rico Planning Board is expected this month. Land clearing has already been initiated and construction will begin immediately upon receipt of the final Planning Board approval.

Federal funds have already been approved in support of the proposed project, and to designate the area for inclusion in the CBRS at this time would represent an inconsistent action on the part of the federal government.

For your additional information, I would also like to point out that the development will be constructed in full conformance with FEMA and Planning Board regulations for floodable and coastal areas, as well as coastal setback and wetland protection requirements.

Mr. Frank McGilvray
3/11/1988

Page 2

2. The inclusion of a coastal dune formation approximately 700 meters wide, to protect a mangrove-lined creek (Caño San Luis) generally only 50 meters wide, appears to be inconsistent with the purposes of the Act and the Department of Interior's definitions.


This mangrove area is not associated with a coastal barrier or maintained by this barrier. Rather, it occurs behind the coastal dune formation simply because of the alignment of the drainage creek. Due to the generally flat coastal topography, mangroves normally extend inland along the rivers in this area. For example, mangroves extend several kilometers inland along the banks of the Espiritu Santo River. (The Espiritu Santo River marks the eastern boundary of the proposed PR-01 area). The mangroves in Caño San Luis are part of this riverine mangrove system, and not part of a mangrove associated with and maintained by a coastal barrier.

3. The identified mangrove is already protected, being zoned for conservation in the Puerto Rico Planning Board's Special Zoning Regulation for Non Urban Areas Surrounding the Caribbean National Forest. This mangrove area has been classified as zone B-2 and is a forest area designated for conservation. Thus, local regulations already in place already afford protection to this aquatic wetland. Additional protection is provided through the Puerto Rico Department of Natural Resources.

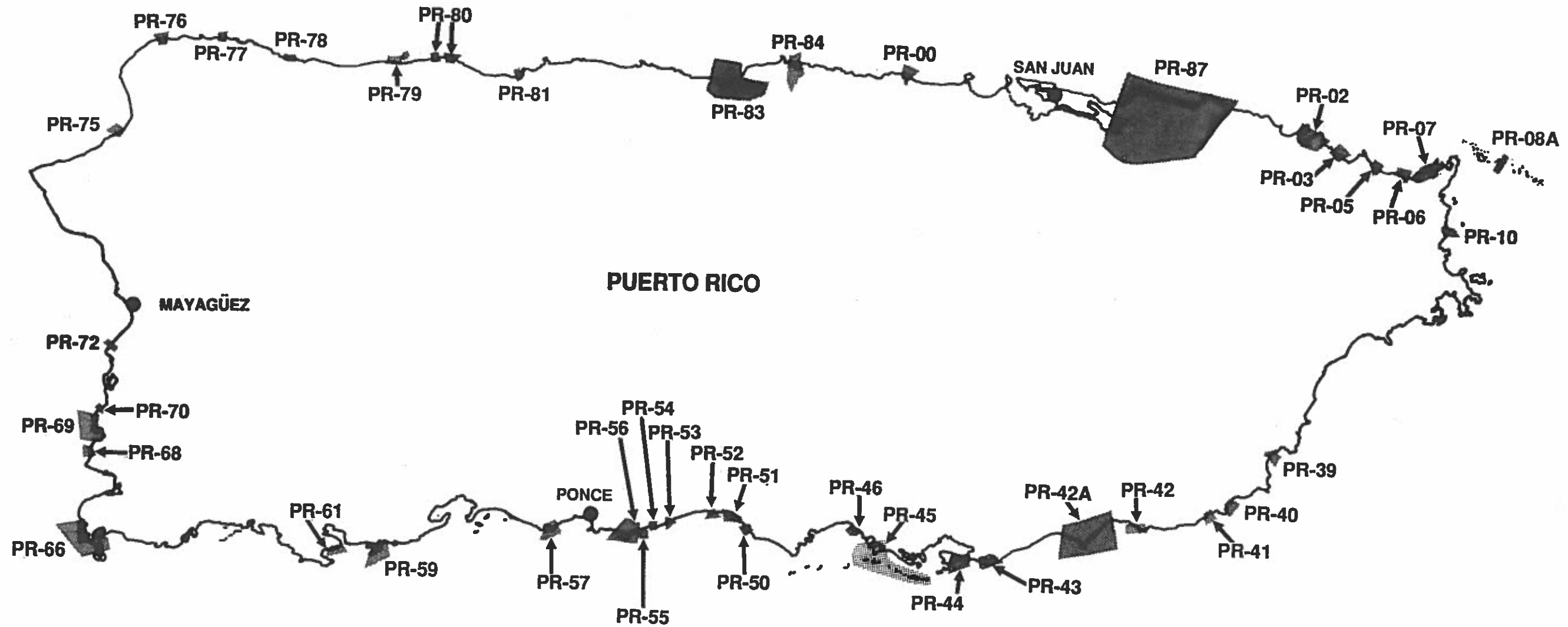
Designation of the proposed CBRS limits will not afford significant additional protection to this mangrove area.

Based on the foregoing considerations we request that unit PR-01 not be included within the Coastal Barrier Resources System. Please do not hesitate to contact me if you require any additional information with respect to this property or the issues discussed in this letter.

Sincerely,


Gregory L. Morris

INDEX TO PROPOSED CBRS UNITS IN PUERTO RICO



USER NOTE: To locate the map(s) of each existing and proposed CBRS unit in this volume, consult the table on the following page.

MAPS DEPICTING PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
PR-02*	Ensenada Comezon	Rio Grande	20
PR-03	Rio Mameyes	Rio Grande	20
PR-05*	Luquillo Spit	Fajardo	22
PR-06*	Juan Martin Spit	Fajardo	22
PR-07	Laguna Aguas Prietas	Fajardo	22
PR-08A	La Cordillera	Cayo Icacos	24
PR-10	Punta Barrancas	Fajardo	22
PR-39*	Puerto Yabucoa	Punta Guayanes	29
PR-40	Punta Tuna	Punta Tuna	31
PR-41	Rio Maunabo	Punta Tuna	31
PR-42	Punta Viento	Punta Tuna	31
PR-42A	Punta Figuras	Guayama	32
PR-43*	Las Mareas	Central Aguirre	33
PR-44	Bahia de Jobos	Central Aguirre	33
PR-45	Cayos de Barca/Cayos de Ratonés Complex	Central Aguirre	33
		Salinas	35
PR-46	Arenal	Salinas	35
PR-50	Chardon	Santa Isabel	36
PR-51	Rio Descalabrado	Santa Isabel	36
PR-52	Punta Pastillo	Santa Isabel	36
PR-53	Bajío de Marea	Playa de Ponce	37
PR-54	Rio Jacaguas	Playa de Ponce	37
PR-55	Isla del Frio	Playa de Ponce	37
PR-56	Punta Cabullones	Playa de Ponce	37
PR-57	Punta Cucharas	Punta Cucharas	38
PR-59	Punta Ballena	Guanica	39
PR-61	Ensenada las Pargas	Guanica	39
PR-66	Cabo Rojo	Cabo Rojo	41
PR-68*	Boca Prieta	Puerto Real	42
PR-69	Punta Carenero	Puerto Real	42
PR-70	Belvedere	Puerto Real	42
PR-72*	Rio Guanajibo	Mayaguez	44
PR-75	Espinar	Aguadilla	46
PR-76	Punta Agujereada	Aguadilla	46
		Isabela	47
PR-77	Bajura	Isabela	47
PR-78	Guayabos	Quebradillas	48
PR-79	Penon Brusí	Camuy	49
PR-80	Punta Maracayo	Camuy	49
PR-81	Puerto de Arecibo	Arecibo	50
PR-83*	Tortuguero	Manatí	52
PR-84	Punta Garza	Manatí	52
PR-00*	Punta Boca Juana	Vega Alta	54
PR-87	Punta Vacía Talega	Carolina	57

*Public comment summaries and DOI responses follow unit maps.

MAPS DEPICTING OTHERWISE PROTECTED, MILITARY, AND
COAST GUARD LANDS ON UNDEVELOPED COASTAL BARRIERS*

USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Fajardo	Commonwealth, Private, Military	22
Cayo Icacos	Commonwealth, Private	24
Culebra	Federal, Commonwealth	25
Isla de Vieques	Commonwealth, Military	26
Punta Puerca	Military	27
Naguabo	Commonwealth, Military	28
Central Aquirre	Commonwealth	33
Salinas	Commonwealth	35
Santa Isabel	Commonwealth	36
Punta Cucharas	Commonwealth, Local	38
Guanica	Commonwealth	39
Parguera	Commonwealth	40
Cabo Rojo	Commonwealth	41
Puerto Real	Commonwealth	42
Aquadilla	Local	46
Barceloneta	Private	51
Bayamon	Commonwealth, Military	56
Carolina	Commonwealth	57

*These maps are provided for information purposes only. DOI is not recommending the addition of these areas to the CBRS unless they are made available for development that is inconsistent with the CBRA purposes.

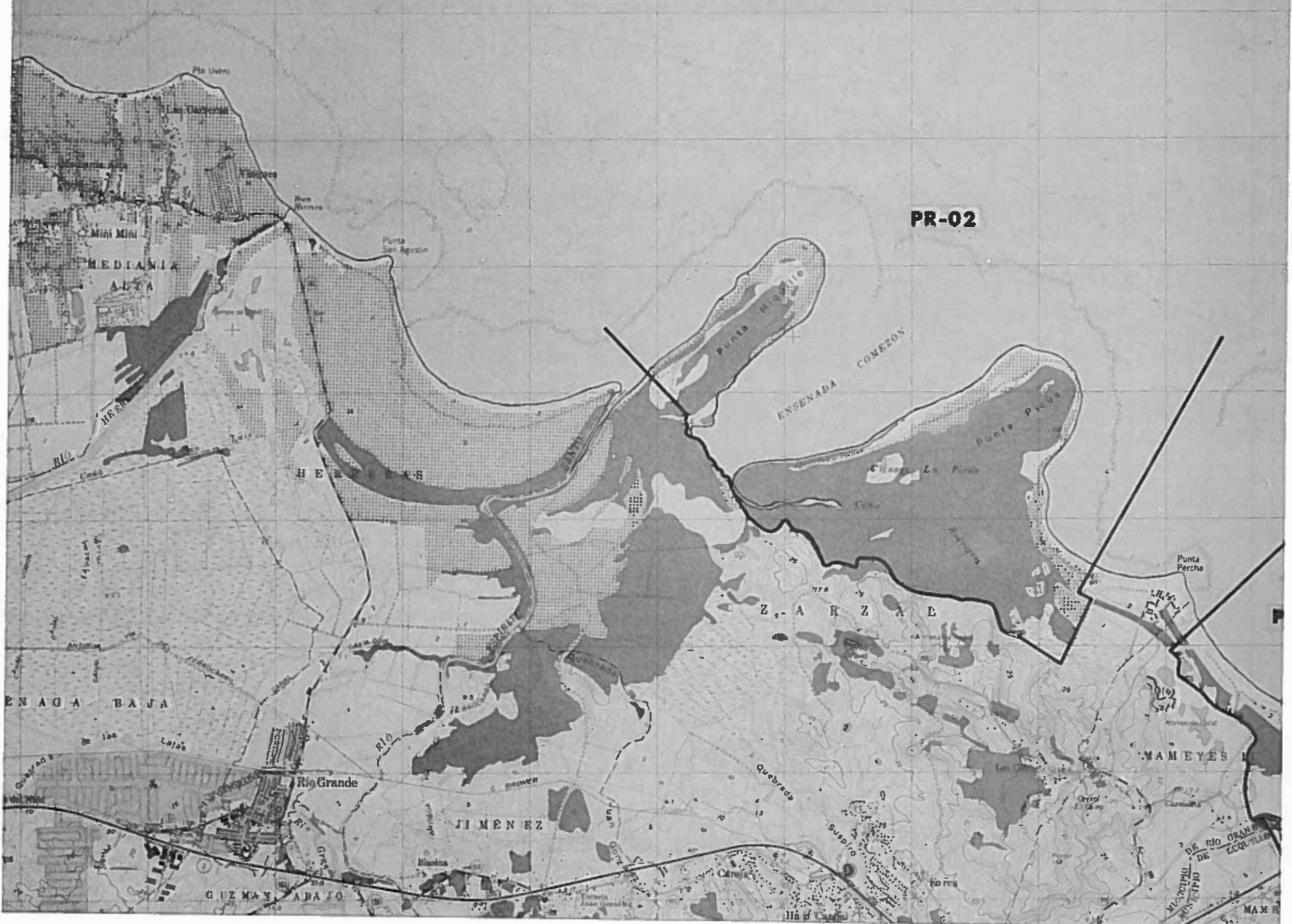
MAP KEY

—————	Proposed CBRS unit boundary
.....	Military, Coast Guard, or otherwise protected, undeveloped coastal barrier
EXCLUDED	Area excluded from a proposed CBRS unit because it is developed
FEDERAL	Federally protected, undeveloped coastal barrier; for information only
STATE	State protected, undeveloped coastal barrier; for information only
LOCAL	Locally protected, undeveloped coastal barrier; for information only
PRIVATE	Privately protected, undeveloped coastal barrier; for information only
MILITARY	Undeveloped coastal barrier owned by the military; for information only
COAST GUARD	Undeveloped coastal barrier owned by the Coast Guard; for information only

Maps are arranged in geographic order around the island's circumference.

A T L A N T I C

O C E A N



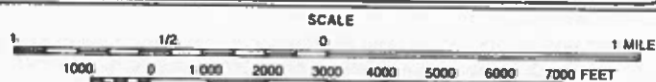
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Report to Congress on the Coastal Barrier Resources System

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RIO GRANDE
PUERTO RICO



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Base Map is the U.S. Geological Survey 1:20,000 scale quadrangle.

PR-02 - ENSENADA COMEZON

Commonwealth Position: The Commonwealth of Puerto Rico requested that this unit be excluded from the CBRS, claiming it is developed.

Other Comments: No other comments concerning this unit were received.

Response: The DOI visited PR-02 and determined that it is undeveloped according to DOI criteria. There are no structures or

infrastructure within the proposed unit boundaries on Punta Miquillo. Although there are some structures on Punta Picua, the density is below that required to be considered developed according to DOI criteria (1 insurable structure per 5 acres of fastland).

DOI Recommendation: The DOI recommends adding PR-02 to the CBRS.

COMMONWEALTH

A T L A N T I C O C E A N

PASAJE DE SA

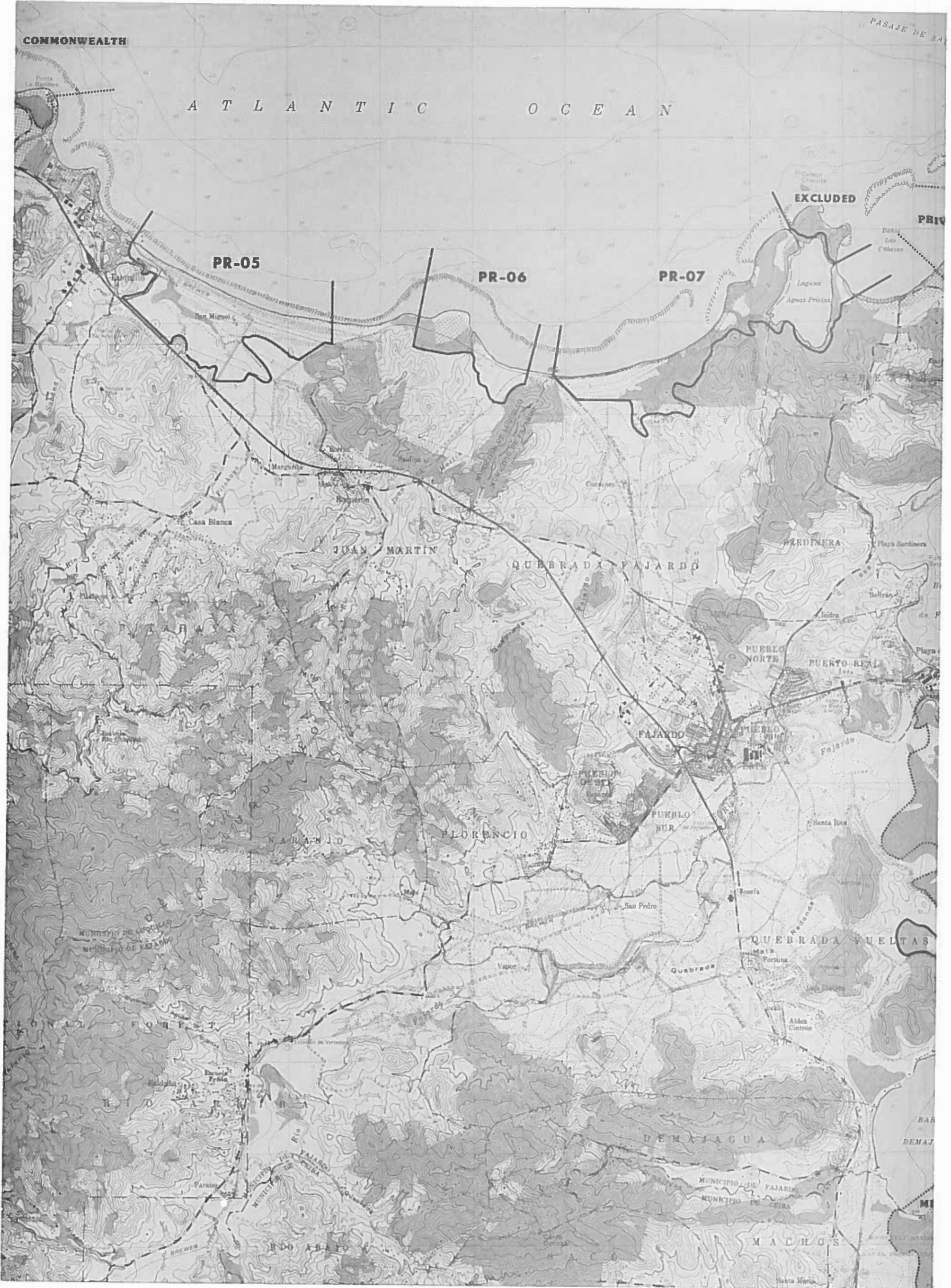
PR-05

PR-06

PR-07

EXCLUDED

PRIV



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PR-05 - LUQUILLO SPIT; PR-06 - JUAN MARTIN SPIT

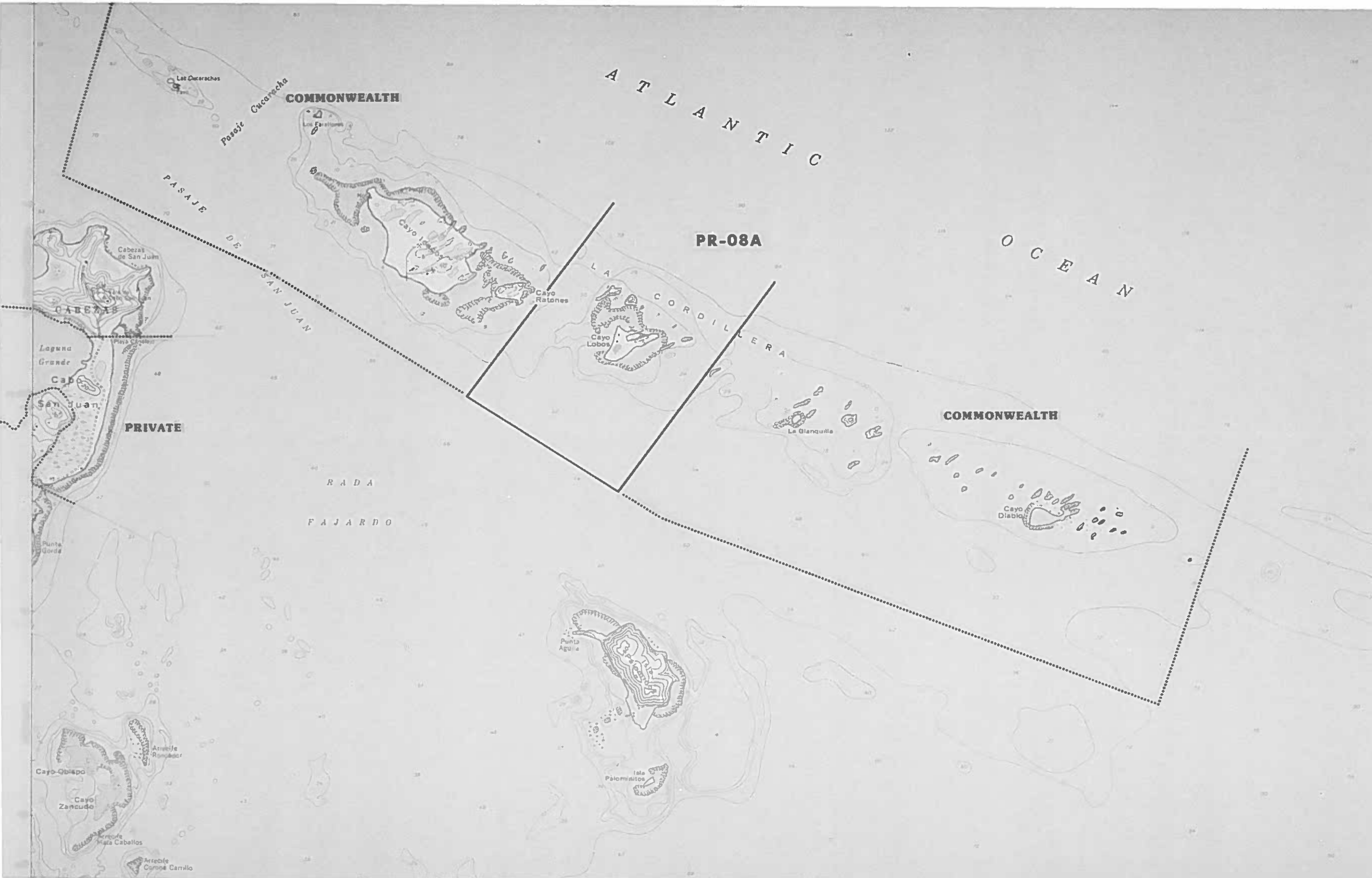
Commonwealth Position: The Commonwealth of Puerto Rico opposes the addition of these two proposed units to the CBRS because a sewer line which will connect the Town of Luquillo with the regional treatment plant has been sited to cross this area. Inclusion in the CBRS could jeopardize funding for the project.

Other Comments: No other comments concerning this unit were received.

Response: Although the DOI is recommending an amendment to Section 6 of the CBRA to allow utilities to use Federal monies to fund essential lines which must cross the CBRS to service developed coastal barriers, this amendment, if enacted by the Congress, will not alleviate the Commonwealth's concerns. This sewer line would not be

servicing a developed coastal barrier; it would be servicing a town on the main island of Puerto Rico. The wetlands associated with PR-05 and PR-06 lie in the direct line between the Town of Luquillo and the sewage treatment plant. The DOI believes an exception should be made if locating the sewer line through the proposed units would be environmentally preferable to siting the line outside the units.

DOI Recommendation: The DOI recommends adding PR-05 and PR-06 to the CBRS; however, the DOI also recommends that the Commonwealth's concerns about the siting of a sewer line through these proposed units be considered during the Congressional deliberations on the units.



Report to Congress on the Coastal Barrier Resources System

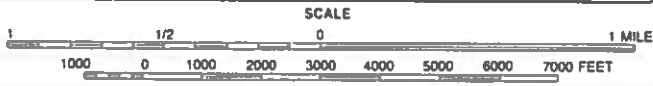
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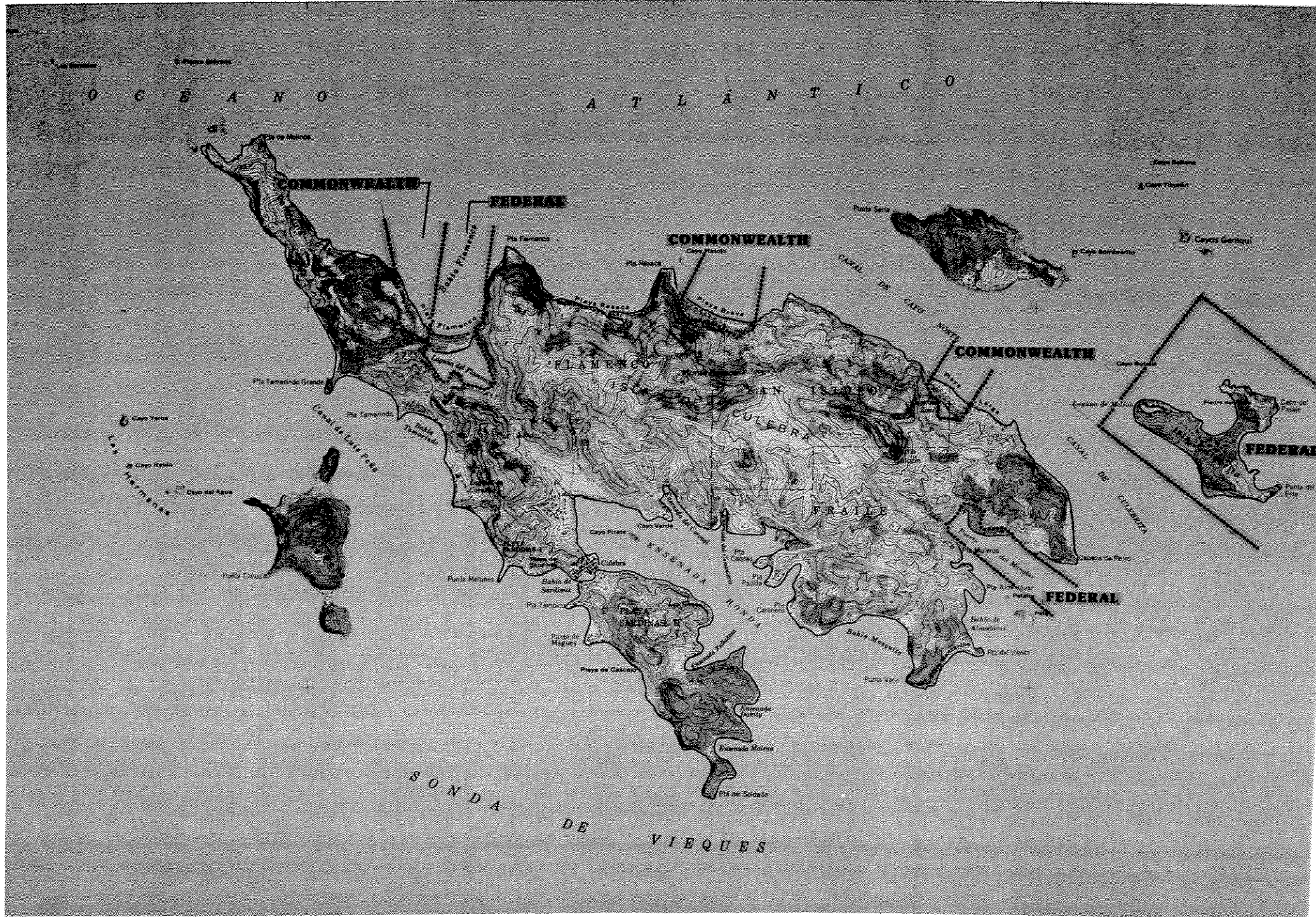
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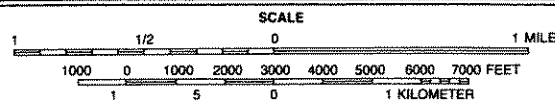
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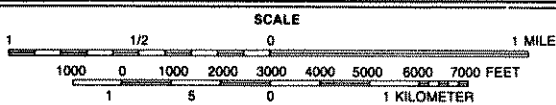
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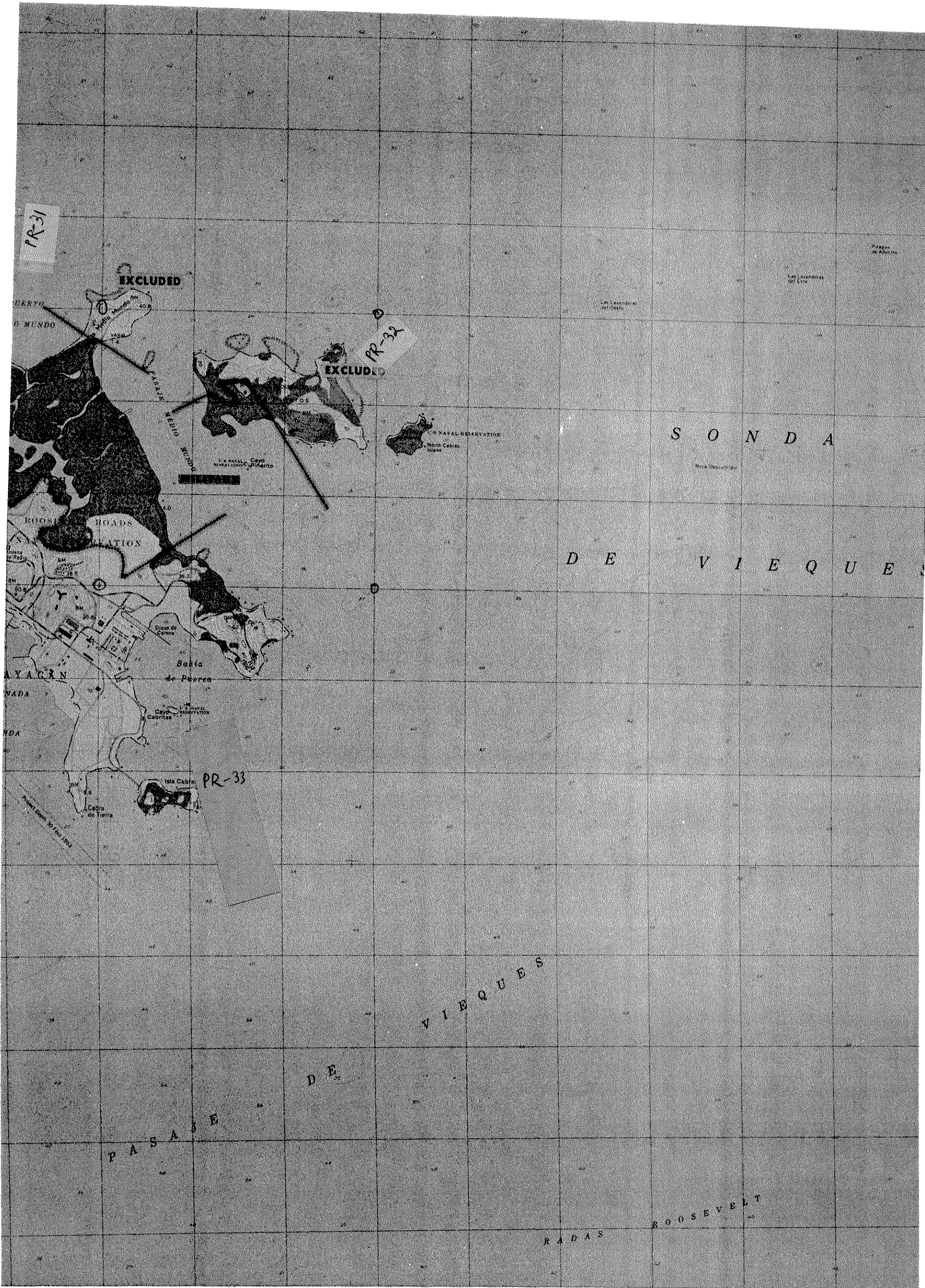
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ISLA DE VIEQUES
PUERTO RICO



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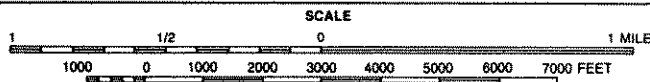
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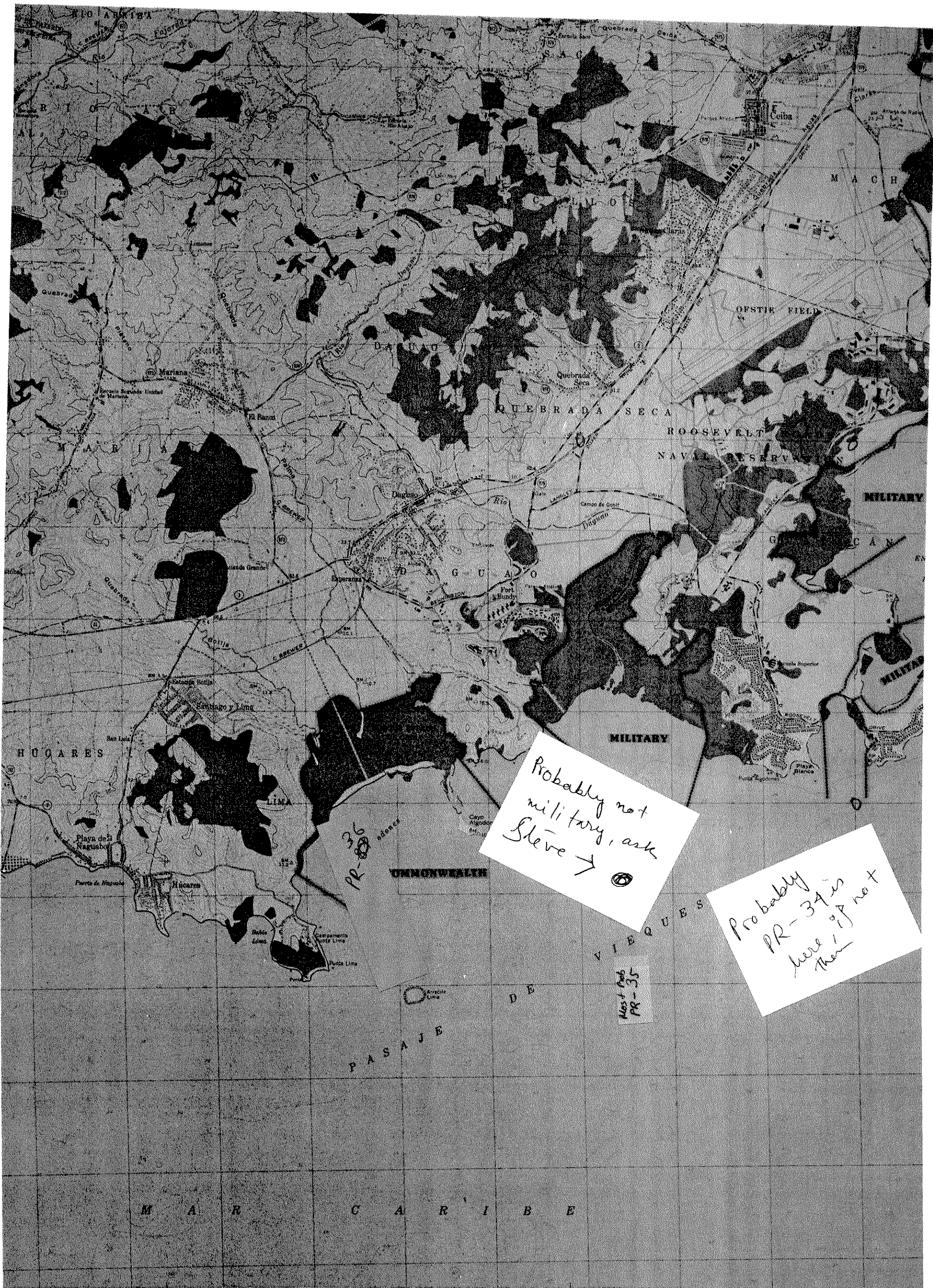
QUADRANGLE
PUNTA PUERCA
PUERTO RICO



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Probably not military, ask Steve →

Probably PR-34 is here, if not then

PR-36

PR-34

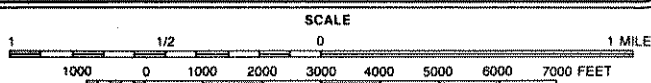
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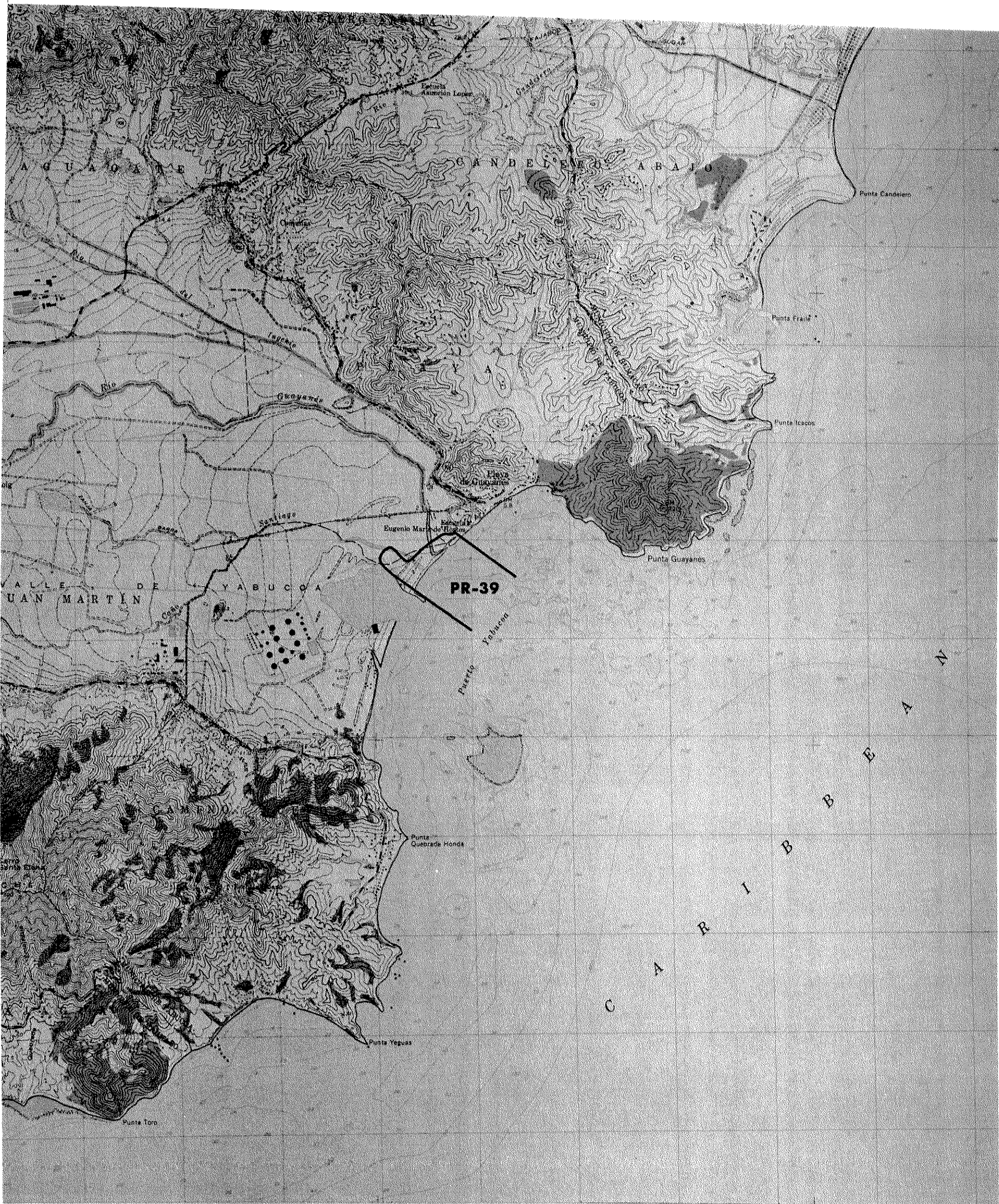
QUADRANGLE NAGUABO PUERTO RICO



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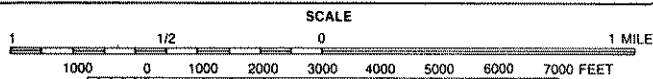
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PR-39 - PUERTO YABUCOA

Commonwealth Position: The Commonwealth of Puerto Rico requested that this proposed unit be excluded from the CBRS because it is developed.

Other Comments: No other comments concerning this unit were received.

Response: The DOI visited PR-39 and determined that a portion of the Yabucoa Sun Oil

Company industrial harbor had been erroneously included in the proposed unit. The remainder of the proposed unit, however, fully qualifies as an undeveloped coastal barrier under DOI criteria.

DOI Recommendation: The DOI recommends adding PR-39 to the CBRS as delineated here to exclude the industrial harbor.



Report to Congress on the Coastal Barrier Resources System

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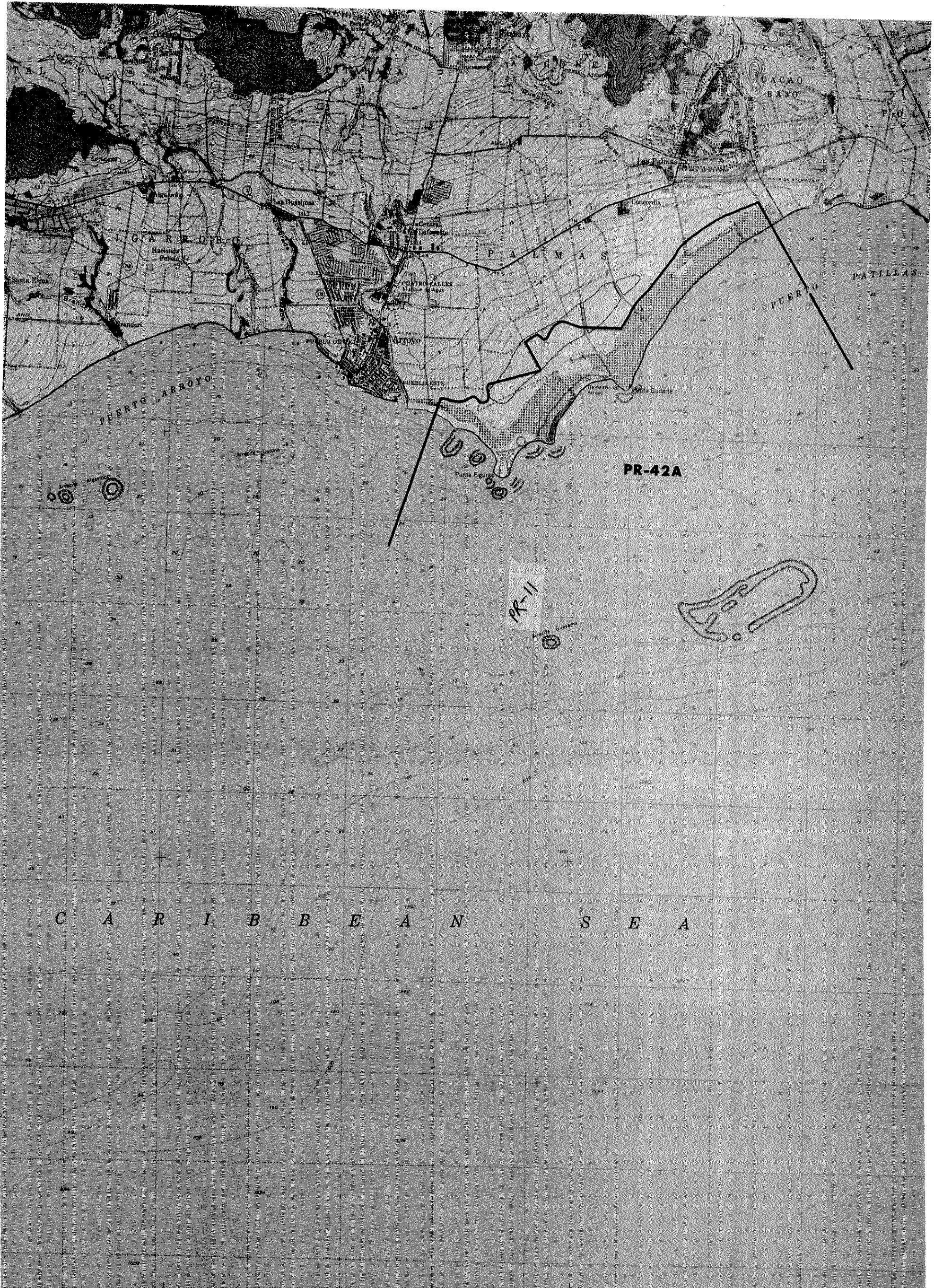
QUADRANGLE
PUNTA TUNA
PUERTO RICO



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GUAYAMA
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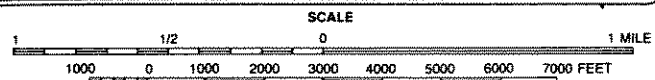
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CENTRAL AGUIRRE
PUERTO RICO



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PR-43 - LAS MAREAS

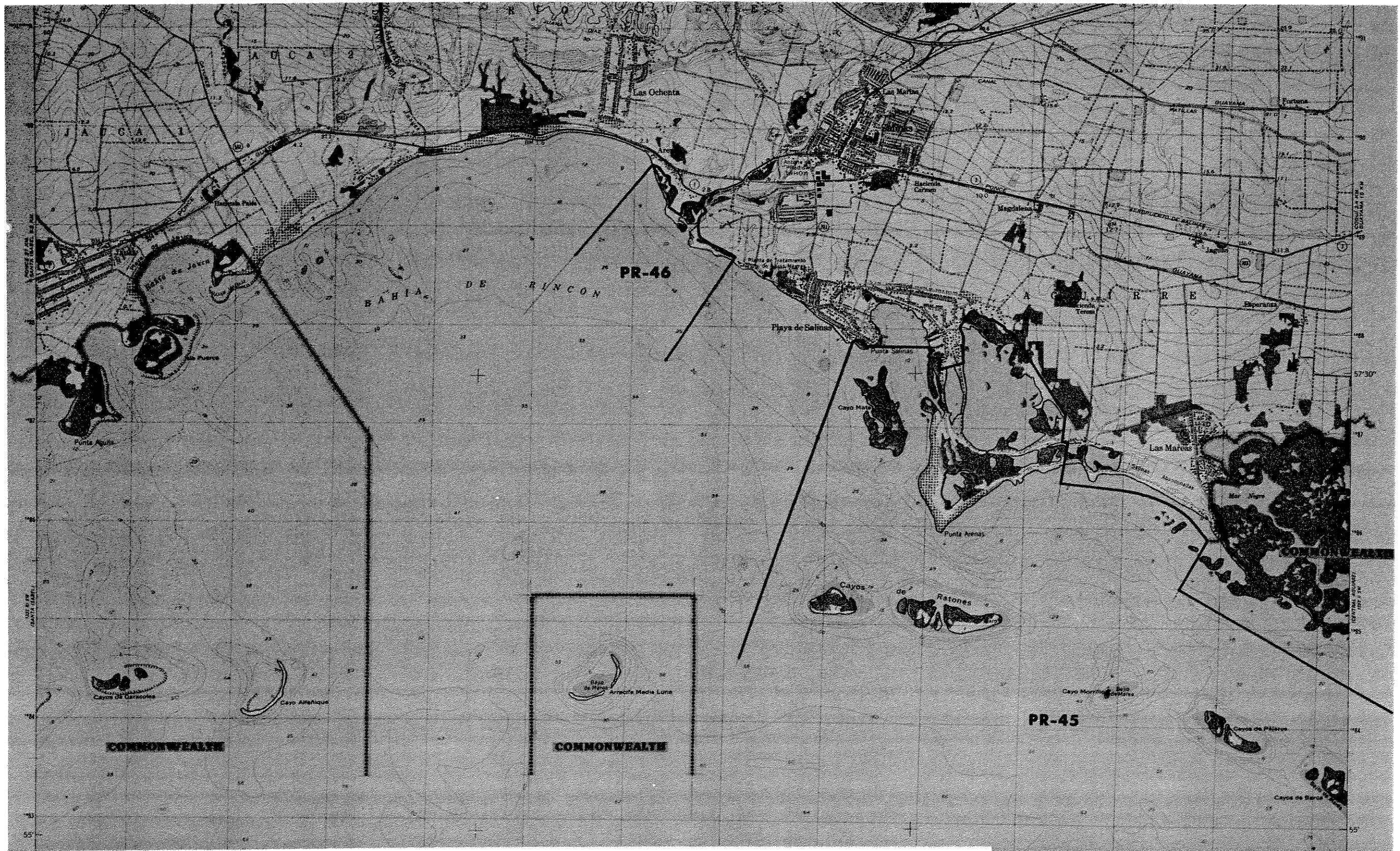
Commonwealth Position: The Commonwealth of Puerto Rico suggested that the configuration of PR-43 in the 1987 Draft Report had been "gerrymandered" to concentrate development in the excluded area and that this concentrated development would be more environmentally damaging than excluding the entire area from the CBRS.

Other Comments: No other comments concerning this unit were received.

Response: All of the proposed additions to the CBRS were delineated in accordance with

the criteria presented in Volume 1 of the Report (Chapter 5). The DOI visited Las Mareas in 1988 and determined that the entire coastal barrier, including the area excluded from the proposed unit in 1987, is undeveloped according to DOI criteria. There is less than one insurable structure per 5 acres of fastland on all of the barrier.

DOI Recommendation: The DOI recommends adding PR-43 to the CBRS as delineated here to include the entire Las Mareas barrier.



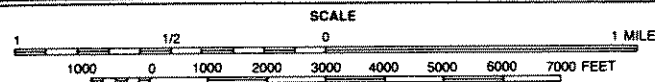
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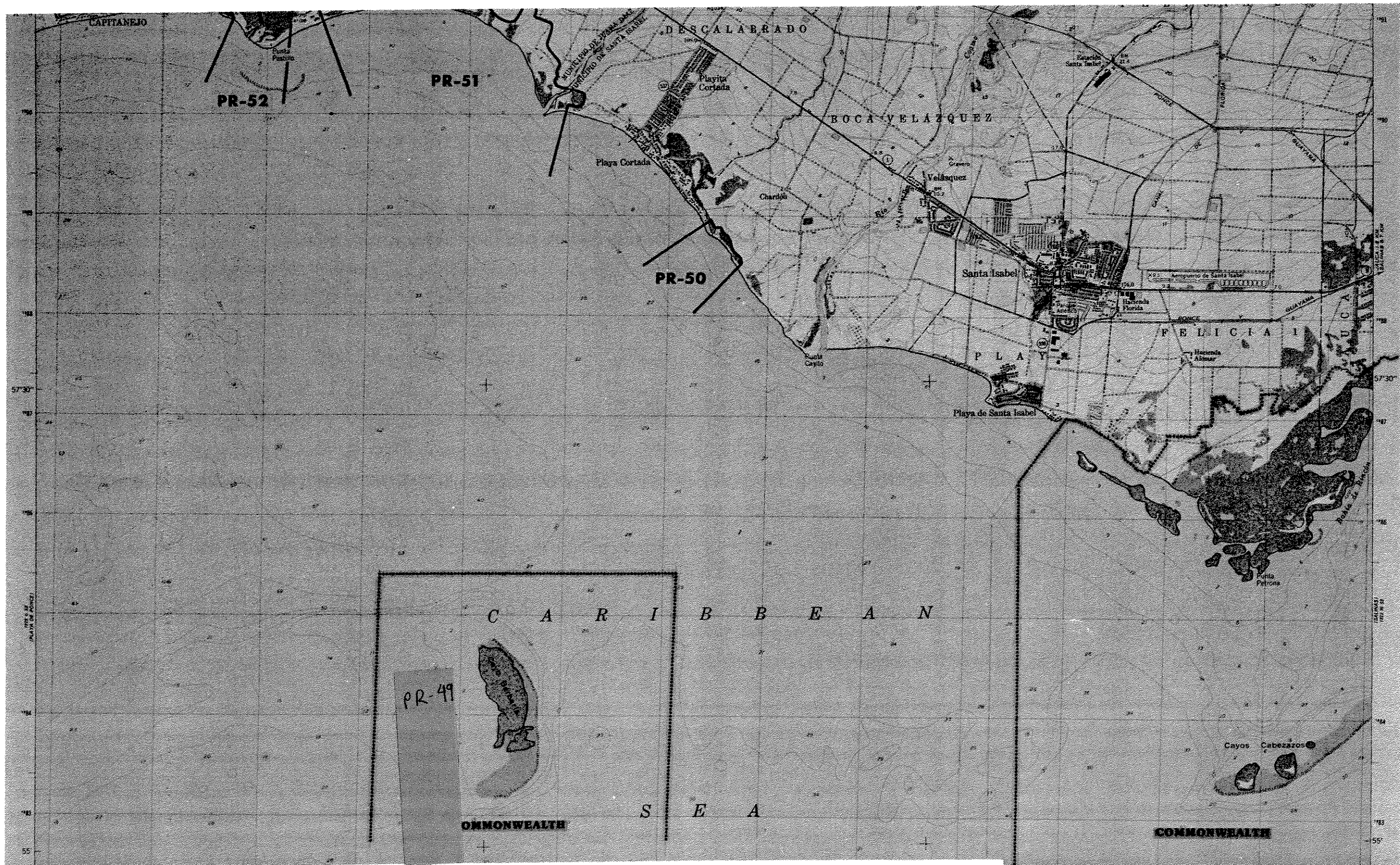
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SALINAS
PUERTO RICO



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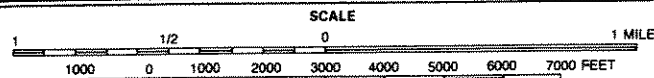
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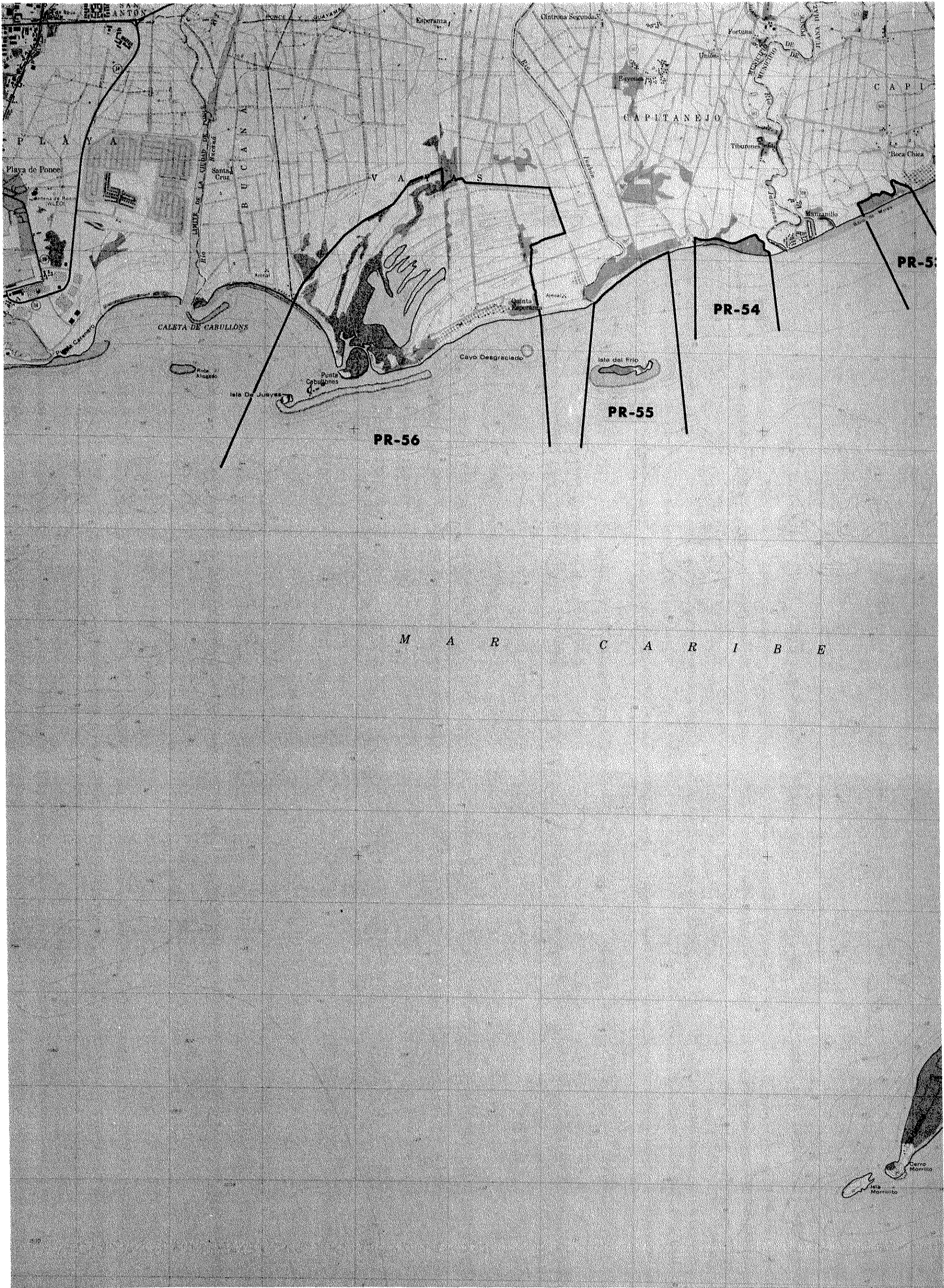
Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
SANTA ISABEL
PUERTO RICO



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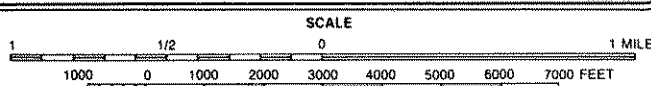
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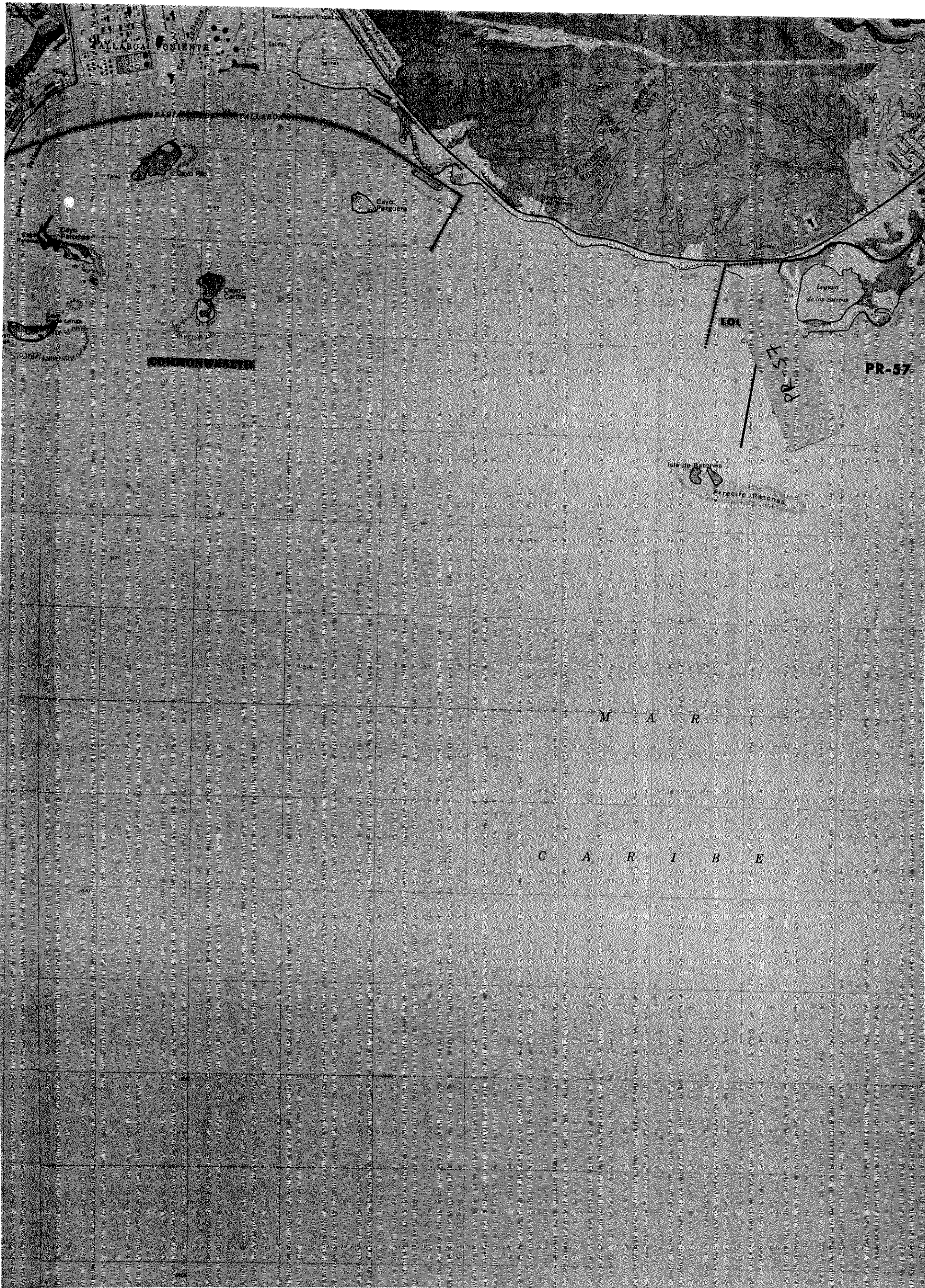
QUADRANGLE
PLAYA DE PONCE
PUERTO RICO



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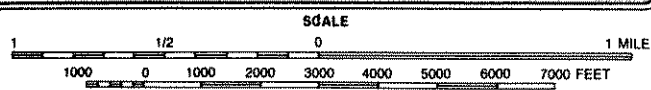
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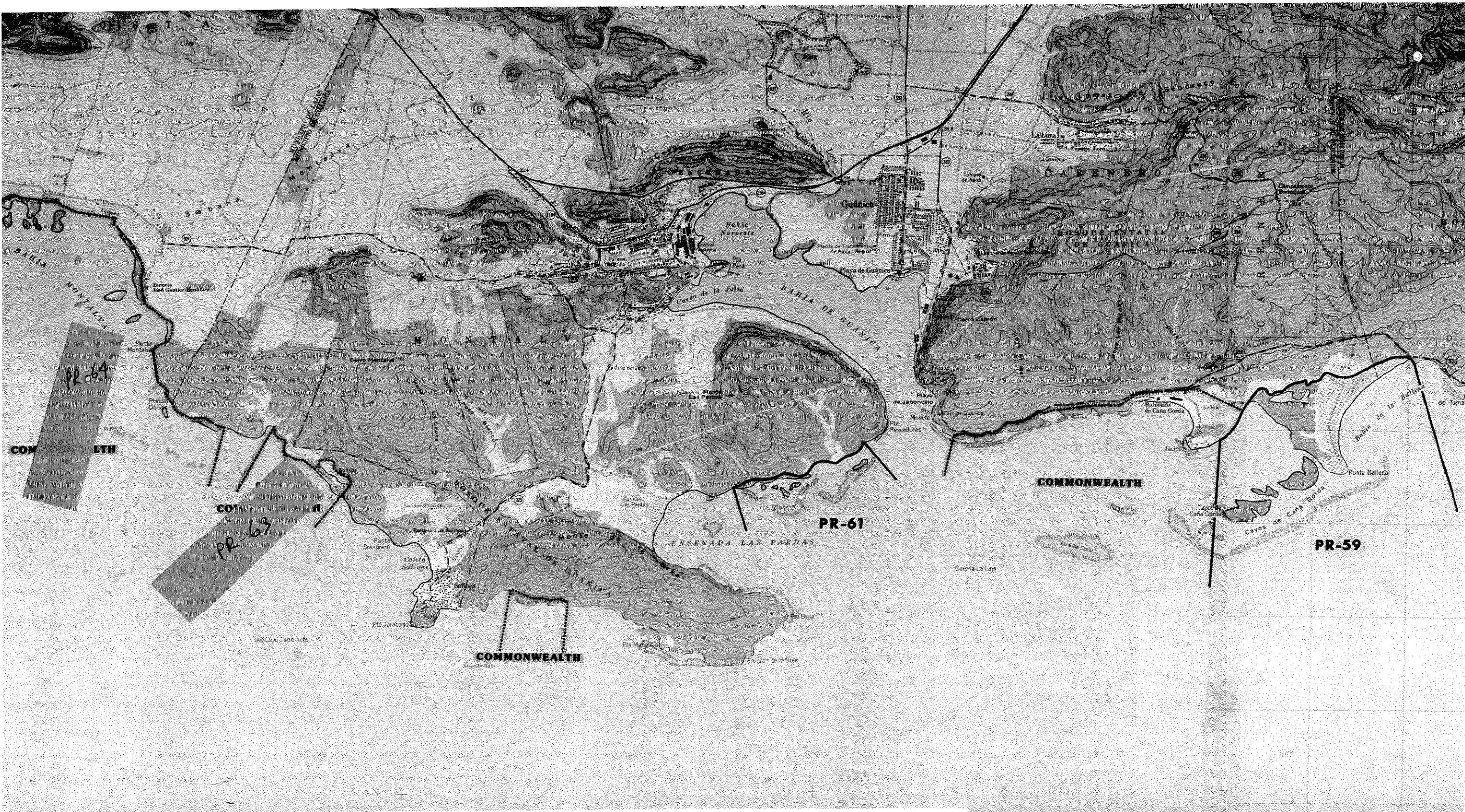


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QUADRANGLE
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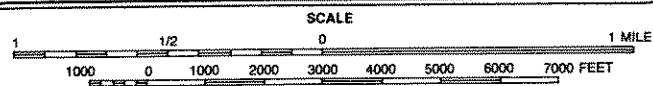
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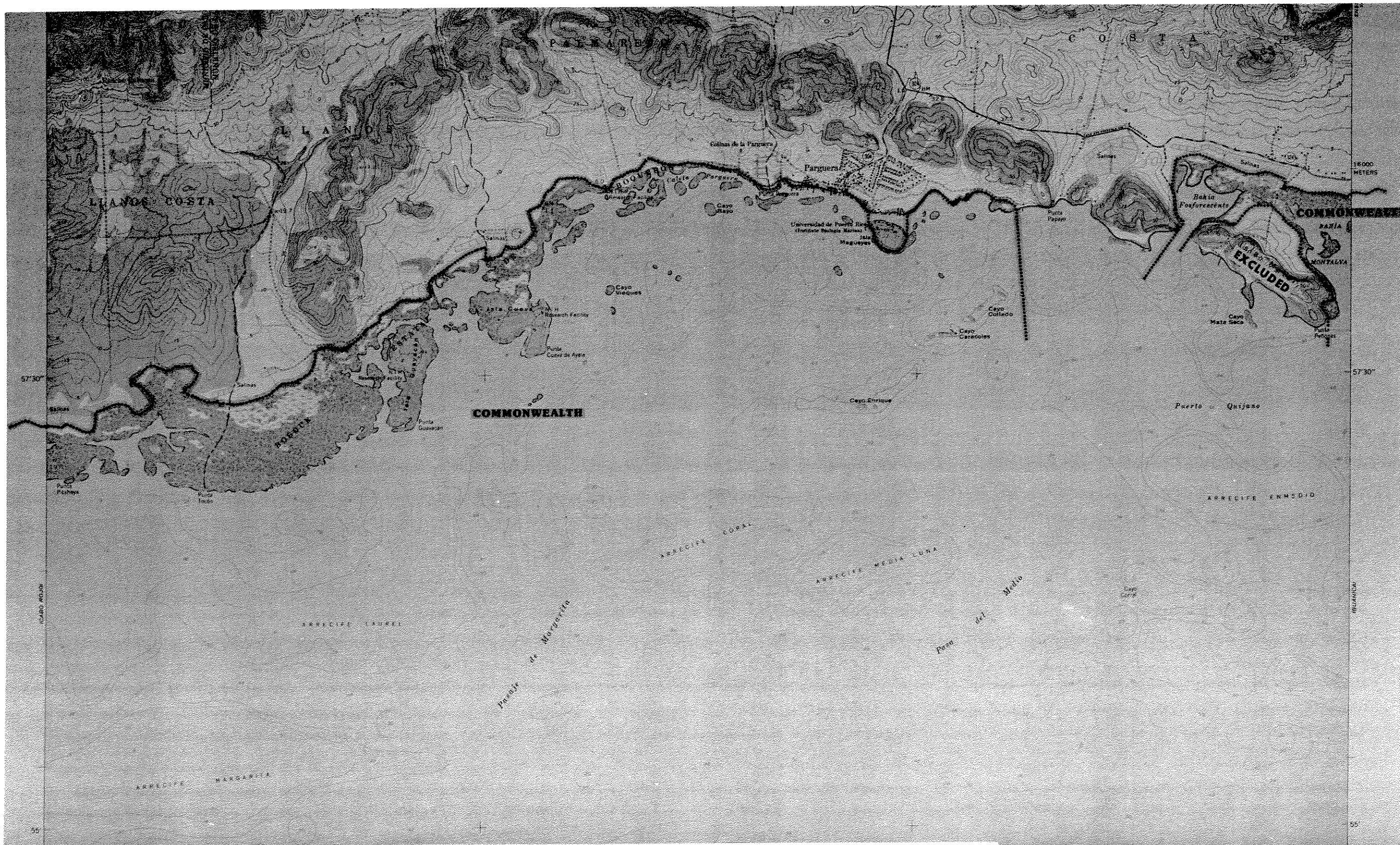
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QUADRANGLE
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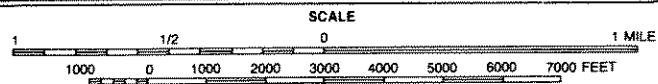
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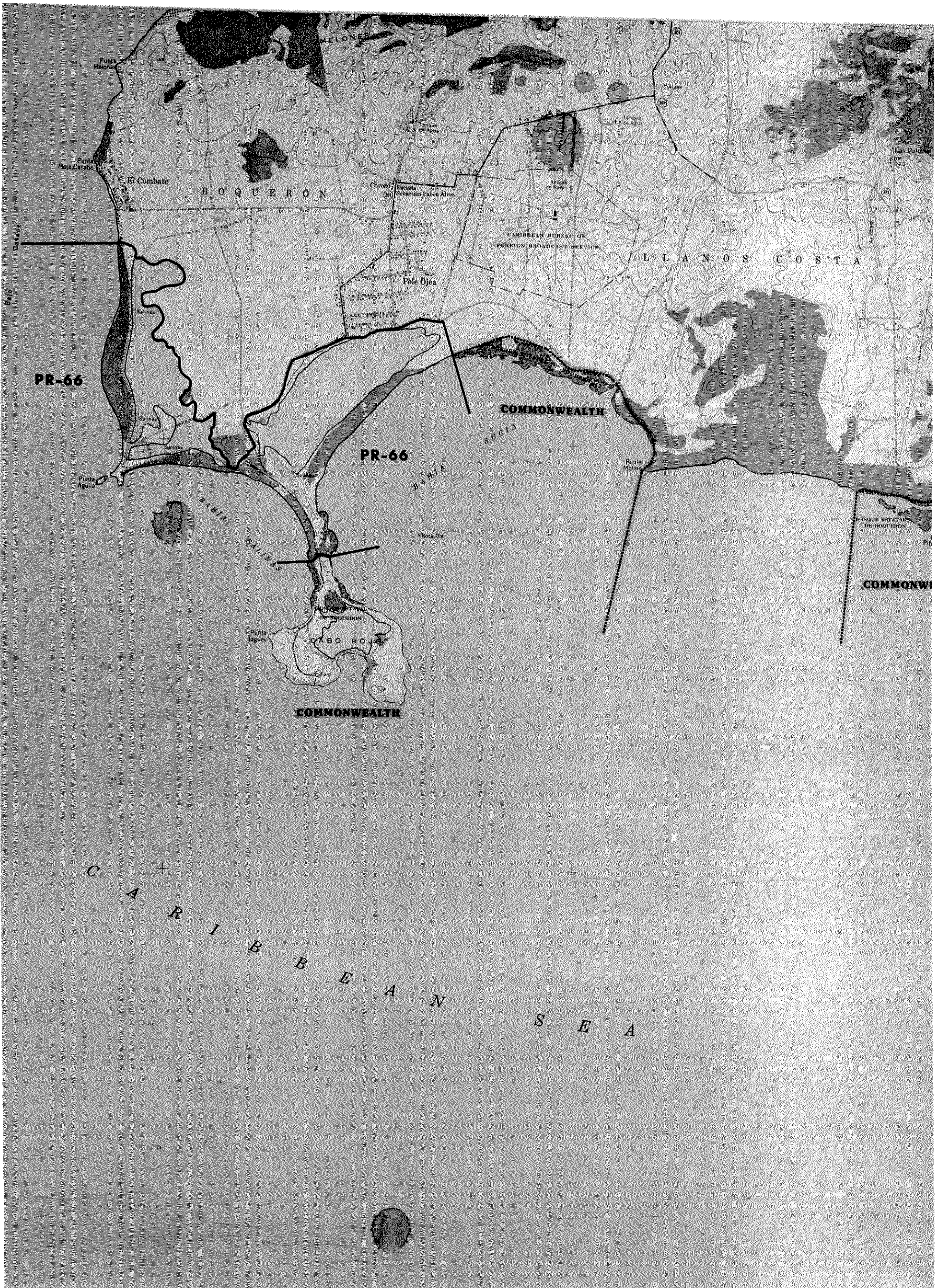
QUADRANGLE
PARGUERA
PUERTO RICO



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QUADRANGLE
CABO ROJO
PUERTO RICO



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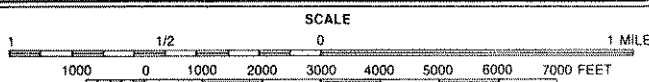
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PUERTO RICO



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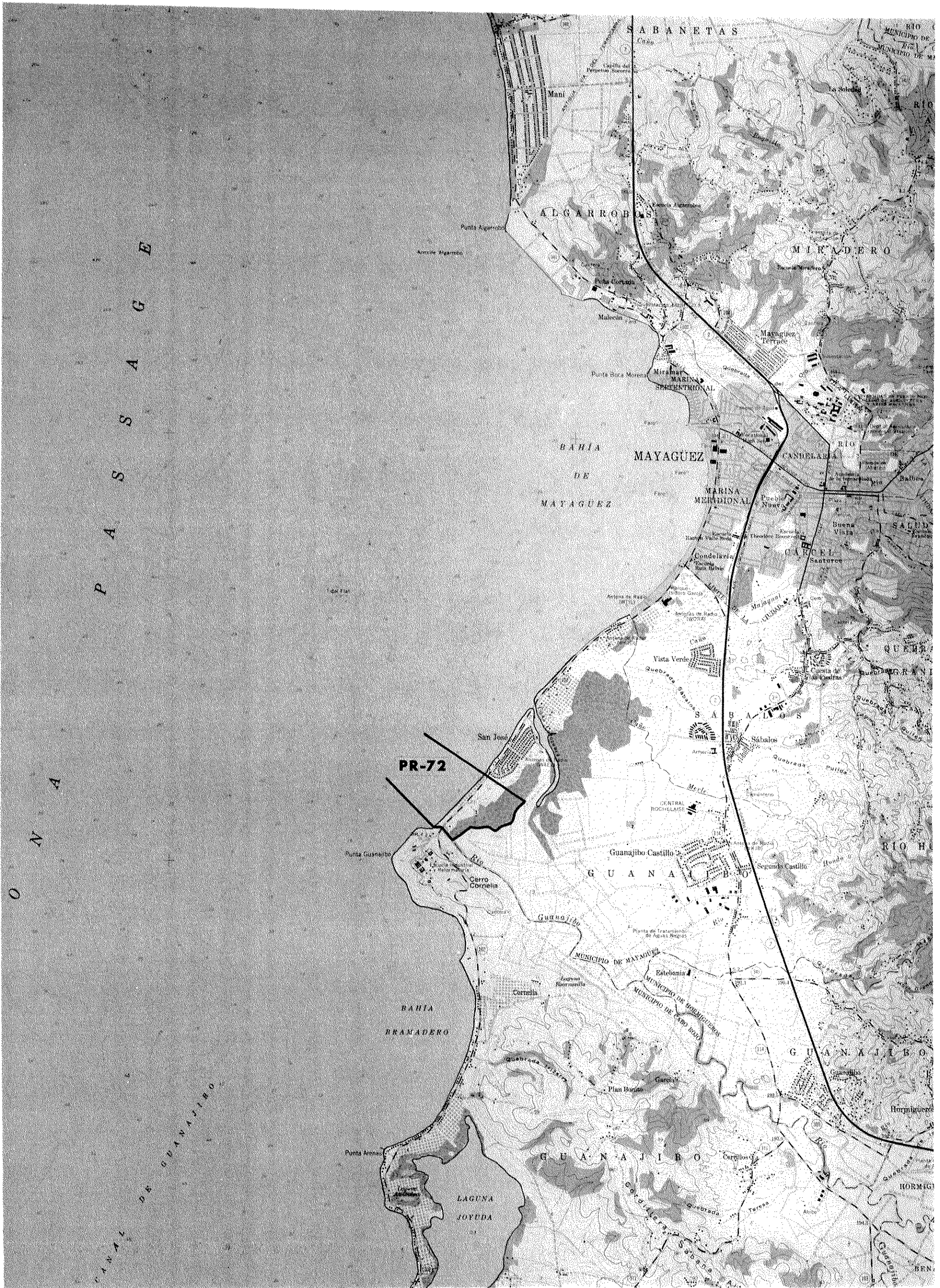
PR-68 - BOCA PRIETA

Commonwealth Position: The Commonwealth of Puerto Rico claims that this unit should not be added to the CBRS because it does not meet the minimum shoreline length requirement.

Other Comments: No other comments concerning this unit were received.

Response: The DOI has carefully planimetered this unit and measures a shoreline length of 0.3 miles.

DOI Recommendation: The DOI recommends adding PR-68 to the CBRS.



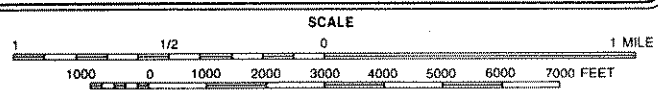
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QUADRANGLE
MAYAGÜEZ
PUERTO RICO



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PR-72 - RIO GUANAJIBO

Commonwealth Position: The Commonwealth of Puerto Rico opposes all additions to the CBRS in Puerto Rico; however, no position on this particular proposed CBRS unit was expressed.

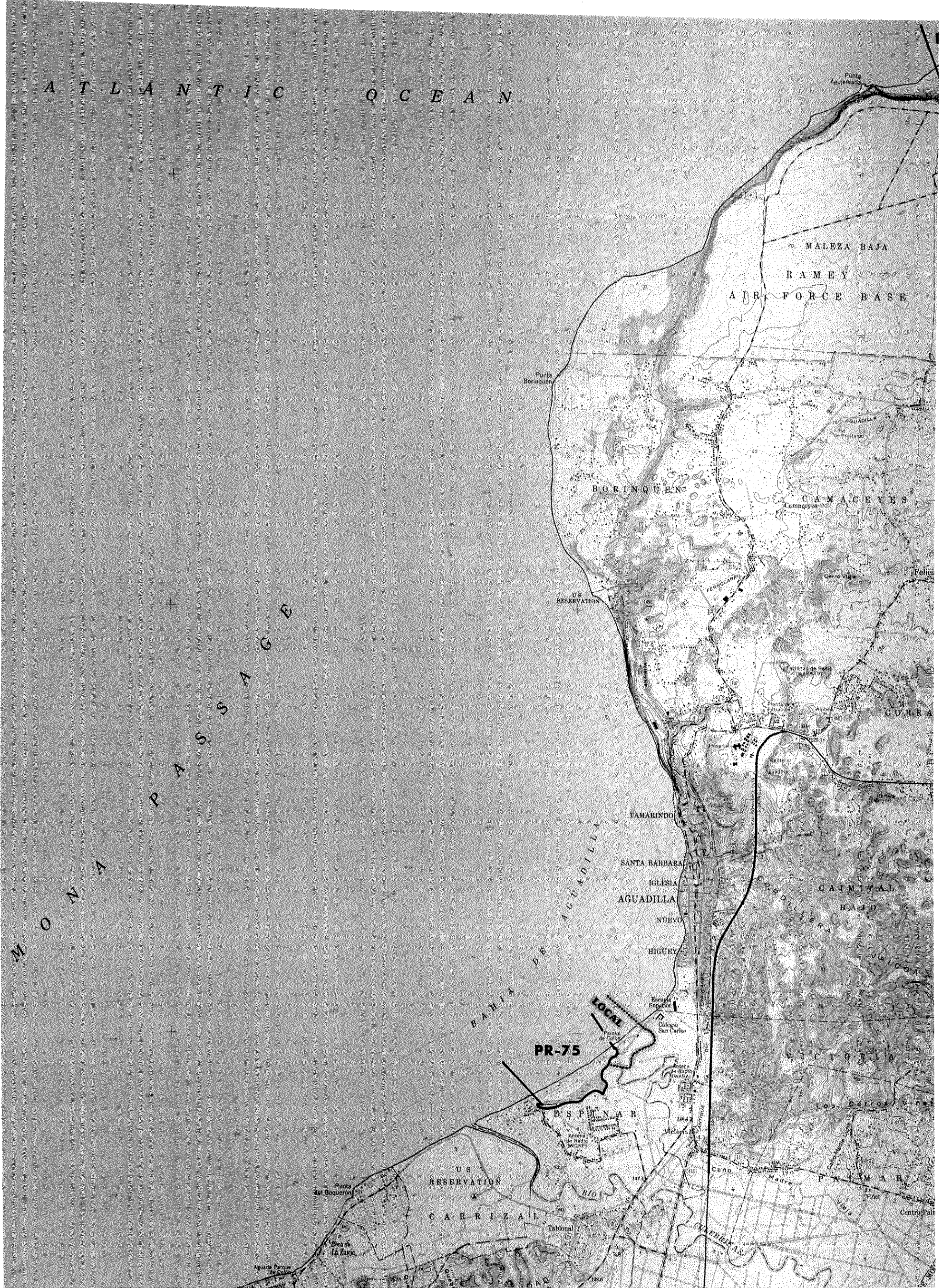
Other Comments: One letter was received requesting that Highway PR-102 be excluded from the CBRS. It is reprinted in the General Comment Letters section (letter number 1399).

Response: There is no provision in the DOI criteria to allow exclusion of a highway from an otherwise undeveloped coastal barrier. The maintenance and repair of an existing highway, however, is an allowable exception to the CBRA's funding prohibitions under Section 6.

DOI Recommendation: The DOI recommends adding PR-72 to the CBRS.

A T L A N T I C O C E A N

M O N A P A S S A G E



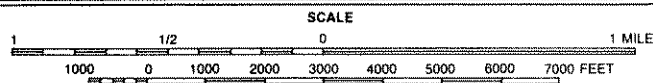
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QUADRANGLE
AGUADILLA
PUERTO RICO



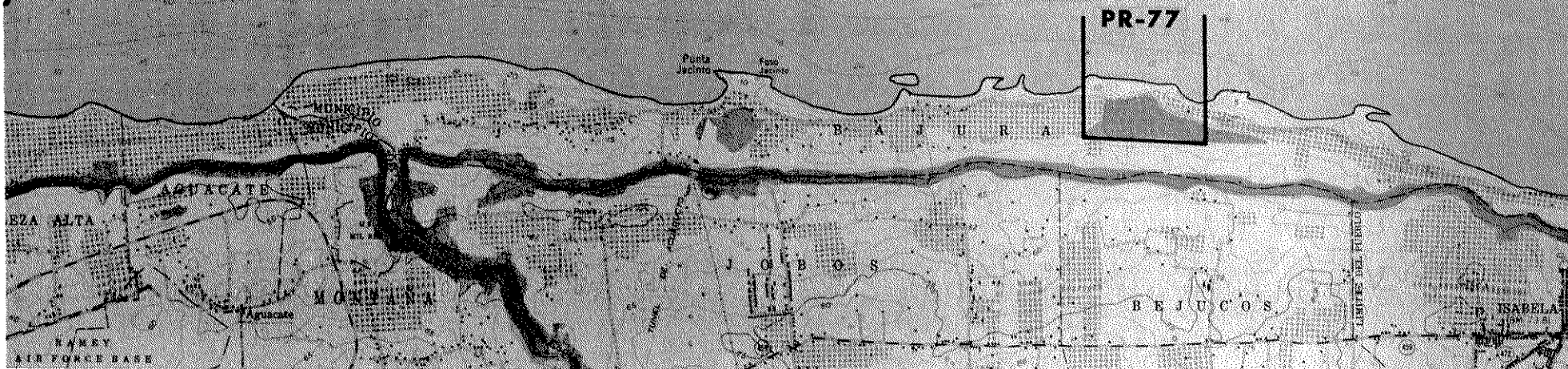
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A T L A N T I C

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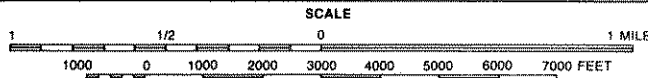
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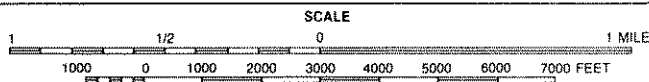
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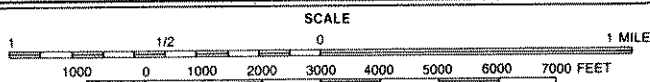
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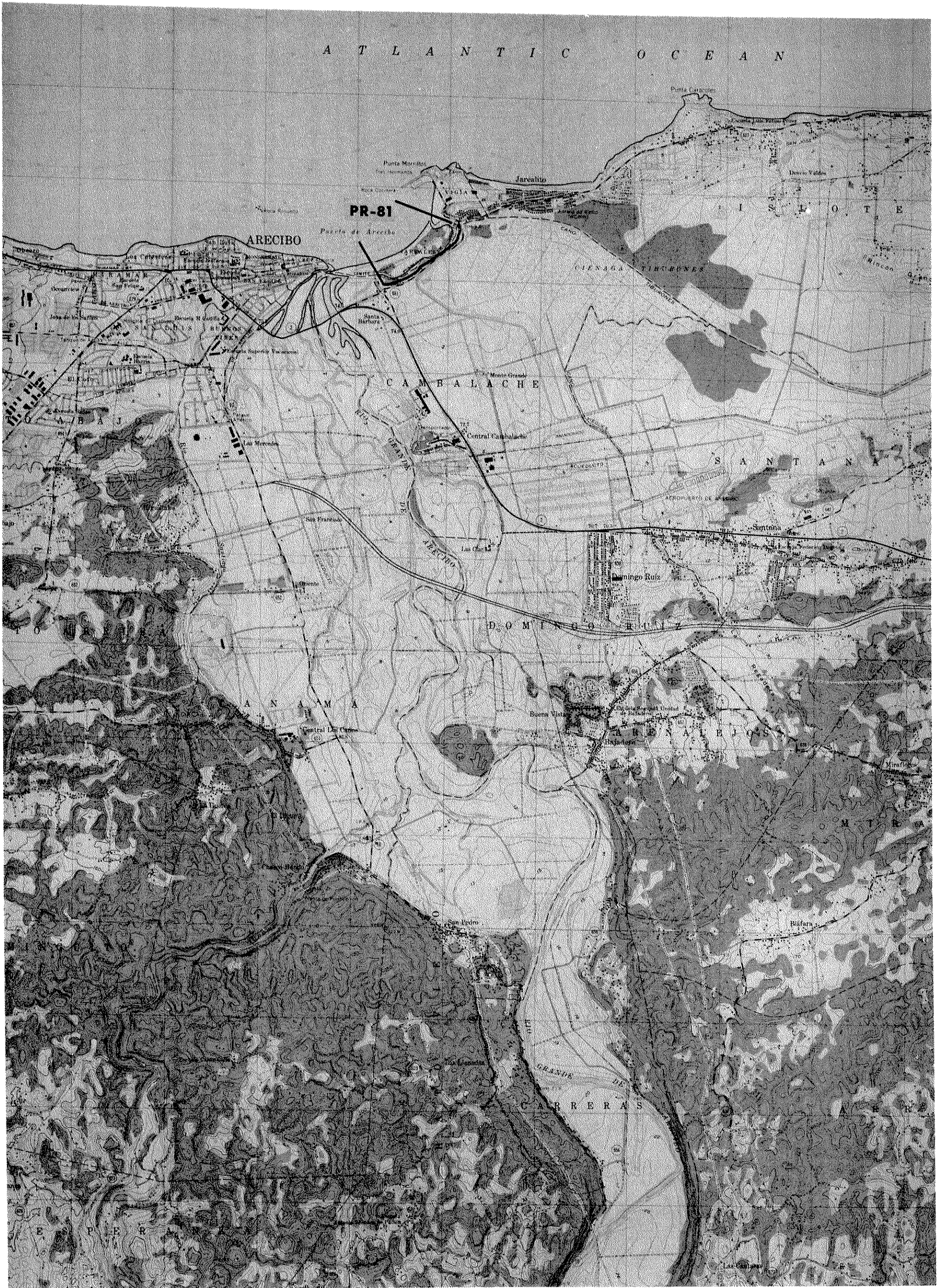
QUADRANGLE
CAMUY
PUERTO RICO



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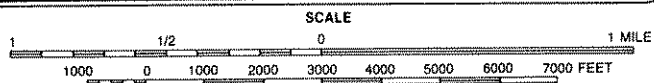
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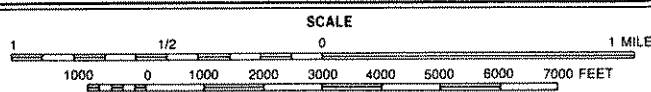
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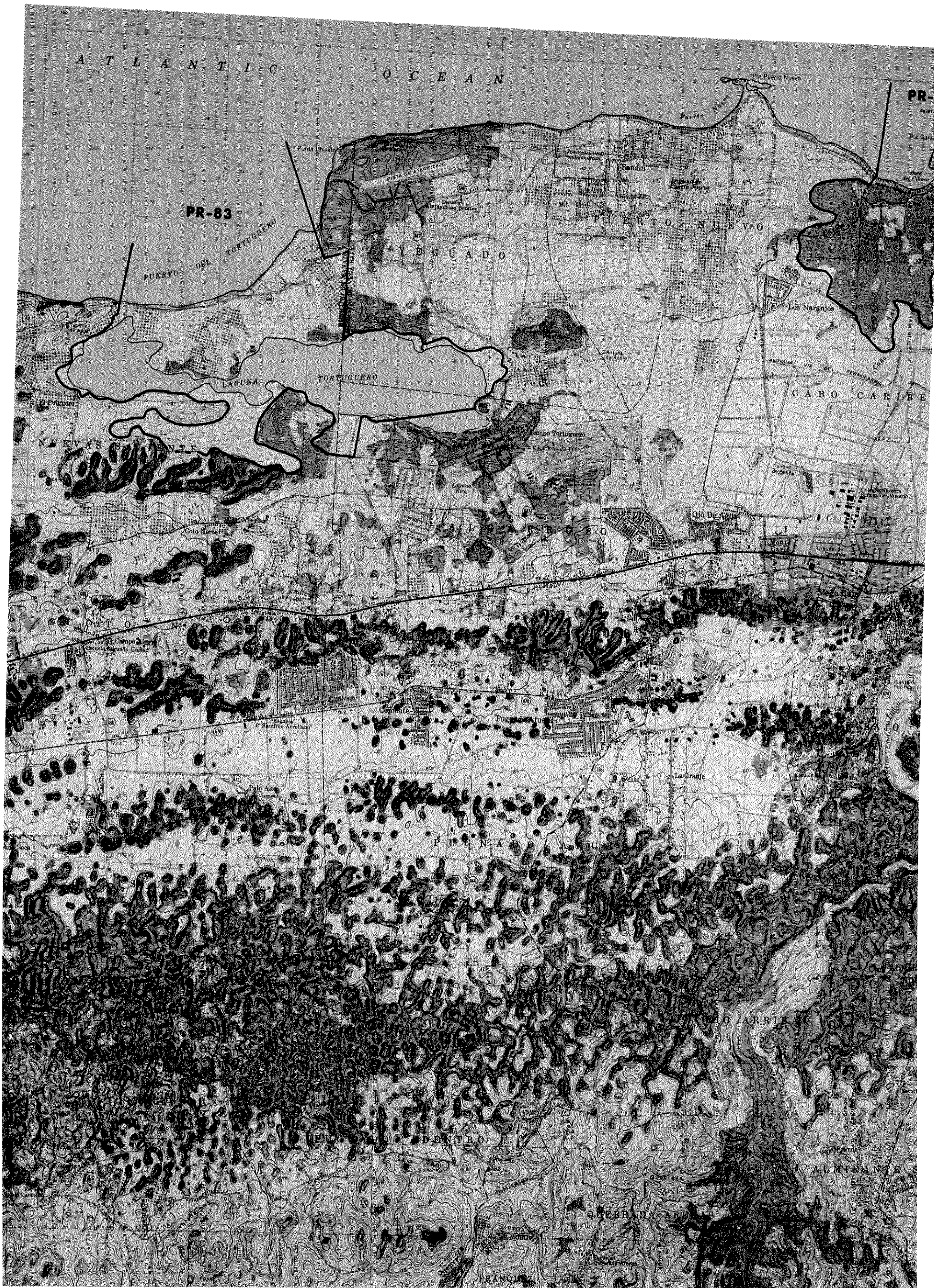


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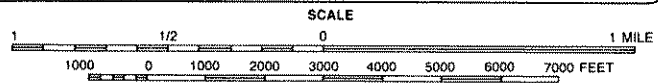
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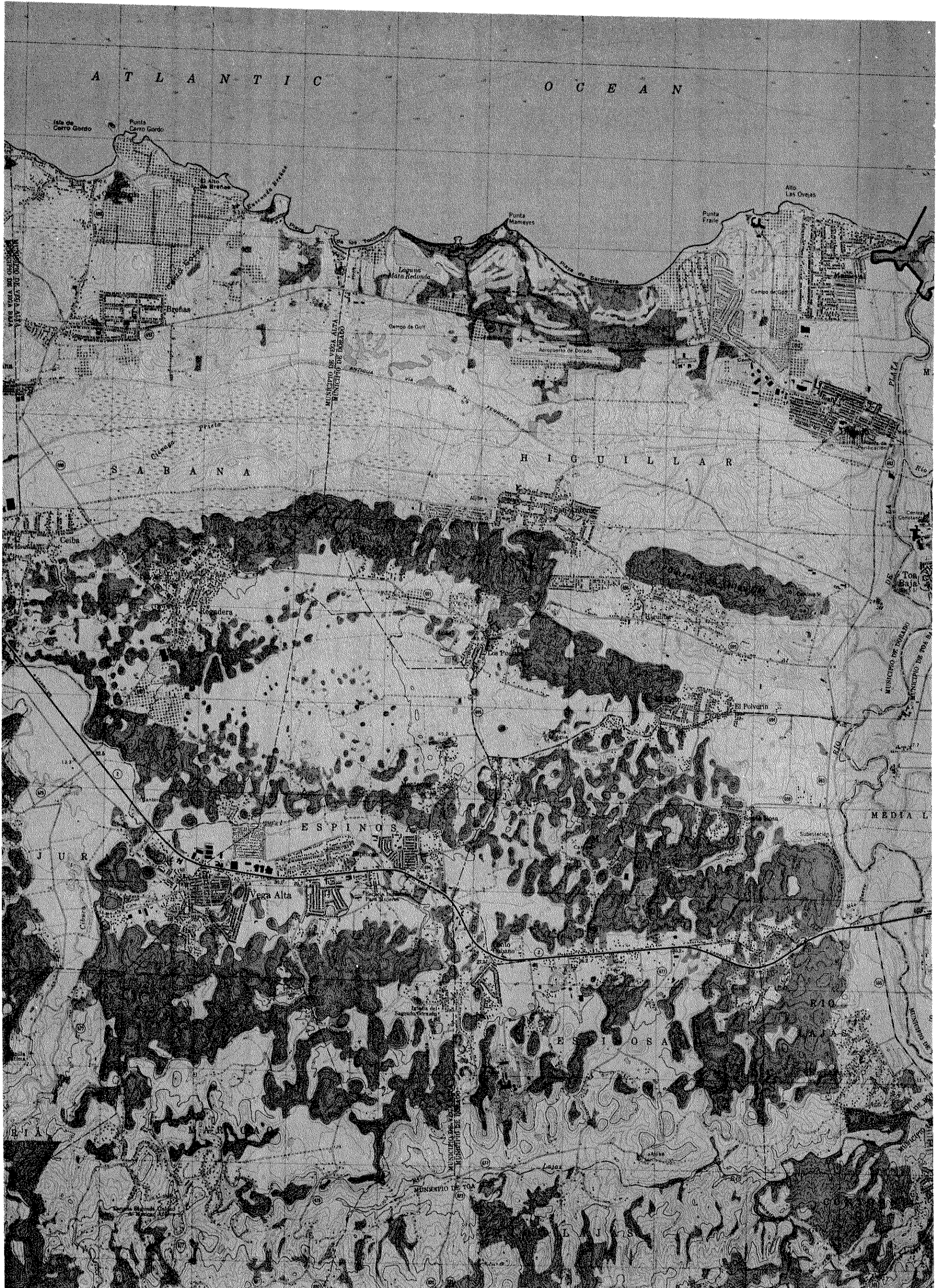
PR-83 - TORTUGUERO

Commonwealth Position: The Commonwealth of Puerto Rico opposes all additions to the CBRS in Puerto Rico; however, no position on this particular proposed unit was expressed.

Other Comments: One letter was received requesting that Highway PR-686 be excluded from the CBRS. It is reprinted in the General Comment Letters section (letter number 1399).

Response: There is no provision in the DOI criteria to allow exclusion of a highway from an otherwise undeveloped coastal barrier. The maintenance and repair of an existing highway, however, is an allowable exception to the CBRA's funding prohibitions under Section 6.

DOI Recommendation: The DOI recommends adding PR-83 to the CBRS.



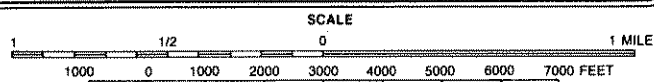
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PR-00 - PUNTA BOCA JUANA

Commonwealth Position: The Commonwealth of Puerto Rico requested that this proposed unit be excluded from the CBRS because the U.S. Army Corps of Engineers has recommended a flood control project for the Rio del La Plata, the last 2,000 feet of which would lie within the proposed unit boundaries.

Other Comments: No other comments concerning this particular unit were received.

Response: Punta Boca Juana fully qualifies for addition to the CBRS under DOI criteria.

There is no provision in the DOI criteria to exempt an area from proposed addition to the CBRS because a flood control project has been recommended for the area. The flood control project would not be prohibited by inclusion in the CBRS; however, no Federal funds could be used for that portion of the project within the CBRS unit.

DOI Recommendation: The DOI recommends adding PR-00 to the CBRS.



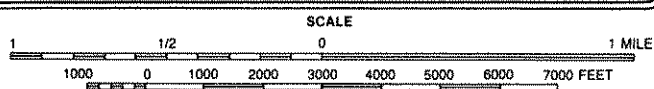
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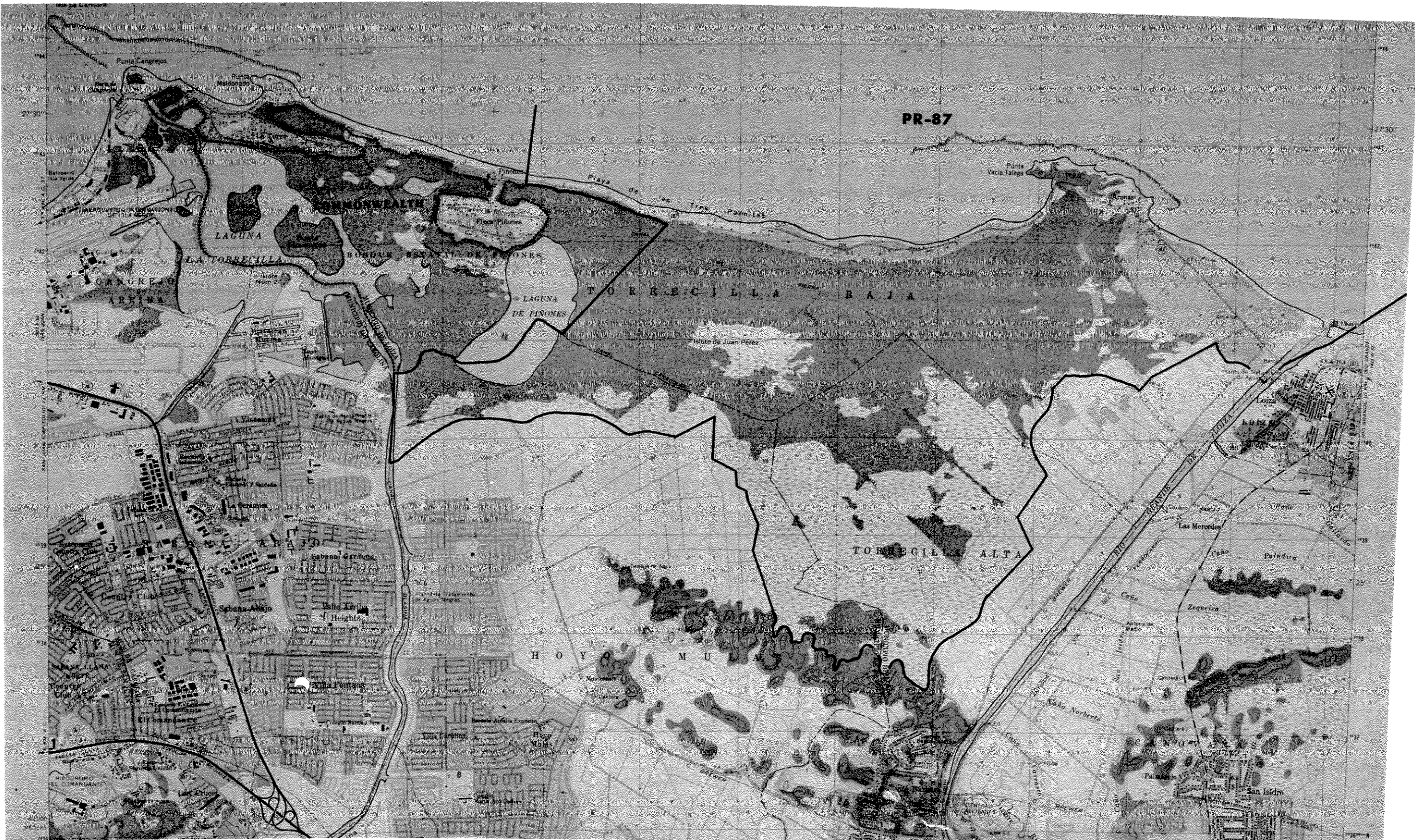
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BAYAMÓN
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