



United States  
Department of  
Agriculture

Forest  
Service

International Institute of  
Tropical Forestry

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File Code: 2530

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Sindulfo Castillo  
Section Chief  
US Corps of Engineers  
Stop 7-1/2 Antilles Office  
400 Fernandez Juncos Avenue  
San Juan, PR 00901-3223

Dear Mr. Castillo:

RE: Permit Application No. SAJ-2010-02881 (IP-EWG)

In the many years that we have been examining permits for activities that affect the Waters of the United States in Puerto Rico, we have never seen one with such a broad scale of effects. Crossing 235 rivers and wetlands is quite a level of impact that transcends the estimated 369 acres. The reason is that the estimate of the affected acreage includes only the actual area on which the pipeline stands, while ignoring the down and upstream effects of the construction and operating activities on wetland and riverine systems that are open systems through which nutrients, sediments, and organisms move. Moreover, while reading the material provided by the applicant, one gets the notion that the proposal has no environmental effects other than minor transitory effects, the project having been designed to avoid permanent effects. These statements are not consistent with what one sees on the Island when heavy equipment is used in wetland environments. Usually sediment compaction and changes in hydroperiod occur, both of which affect the habitat and wetland conditions. The construction methods are nicely illustrated and one is led to believe that these are fail-proof techniques with no effects on the wetland systems. However, it is impossible to reach conclusions about construction effects of this large project without adequate information about how these interventions will affect hydroperiods (including up and downstream fluxes of water and materials), sediment compaction, and species composition.

We could not find adequate discussion of the wetlands effects of the project in the State EIS, and suggest that these issues be fully disclosed for the Waters of the United States.

Sincerely,

ARIEL E. LUGO  
Director

