



Fideicomiso de Conservación de Puerto Rico

The Conservation Trust of Puerto Rico

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Edgar W. García
Project Manager
US Army Corps of Engineers
Puerto Rico & U.S. Virgin Islands Permitting Office
Stop 7½ Antilles Office
400 Ave Fernandez Juncos
San Juan, PR 00901-3223

RE: Comments of the Conservation Trust of Puerto Rico for the Joint Permit Application of Natural Gas Pipeline Project

Dear Mr. García:

Greetings from the Conservation Trust of Puerto Rico. The Conservation Trust of Puerto Rico (CTPR) is a private, nonprofit organization established in 1970, whose mission is to secure functional and healthy ecosystems in the islands of Puerto Rico, and to instill in their inhabitants a sense of responsibility towards the conservation of our natural resources, so that we may receive the ecosystem services that will help us achieve our social, economic and quality-of-life goals.

The CTPR has evaluated documents related to the Joint Permit Application for the Natural Gas Pipeline Project, proposed by the Puerto Rico Electric Power Authority, and would like to formally provide the following comments.

1. In 1984, Hacienda La Esperanza was designated as a nature reserve by the Planning Board of Puerto Rico. This designation implicates the conservation of the biological processes necessary to maintain the functionality of the ecosystems being protected. With only 7.4% of our land under legal protection, any impact on any of these protected areas (given the 93% available for development), should receive the strictest environmental scrutiny and should be unwarranted

under any economic development argument unless there are greater national security interests or life related needs.

2. Due to the high ecological value of the ecosystems being protected in Hacienda La Esperanza Nature Reserve (HLENR), the U.S. Fish and Wildlife Service (USFWS) has selected it as a reintroduction site, of a northern population, of the critically endangered Puerto Rican Crested Toad (PRCT) (*Peltorhynchus lemur*); this species is the only toad native to Puerto Rico. The CTPR and the USFWS have a collaborative agreement to establish a second population of the PRCT in the northern karst region of Puerto Rico, and has identified a third site for potential reintroduction in the future; one population will be located in HLENR. In addition, the applicant identified only Peñuelas as possible habitat for the PRCT. However, historical records locate the species in the northern karst between Bayamón and Manatí.

Reasons for listing the PRCT included the limited number of breeding sites, vulnerability to habitat destruction and human disturbance, over-utilization, and predation, among other threats. Since 1992, the species has not been found in the northern karst area. The currently known natural breeding ponds are located in the southern karst of Puerto Rico.

The final recovery plan for the PRCT approved in 1992 states that the toad could be considered for delisting when six self-sustainable populations have been established and maintained for 10 years: three in the northern karst and three in the southern karst of Puerto Rico. The recovery activities for the PRCT have been planned, implemented and monitored throughout the PRCT Recovery Working Group (Group). This Group includes representatives of the USFWS, the Puerto Rico Department of Natural and Environmental Resources (DNER), the American Zoo and Aquarium Association (AZAA), the Puerto Rico National Park Company (PRNPC), local NGO's, universities, and community groups. Since 2003, the Service has been the leader of this Group, providing funding, technical assistance, logistical support, and coordination of other recovery activities.

3. HLENR protect important water bodies as the "Rio Grande de Manatí" and "Caño San José". Almost all the area protected by the reserve is cover with different kinds of herbaceous wetlands, Pterocarpus forests, remnants and mangrove. The integrity of these systems and associated ecosystems depends on the connectivity that allows the continue flow of species throughout the water bodies. In order to maintain connectivity along the wetlands of the reserve, the CTPR is implementing two wetland restoration projects:

Project 1 is part of a cooperative agreement between the CTPR and USFWS for the ecosystem reforestation and reestablishment of the irrigation system.

Project 2 is a *Pterocarpus officinalis* forest restoration in accordance with a Consent Decree agreed upon by the United States of America (USA) and Power Poles Inc. (PPI) due to PPI's impact on 17 acres of jurisdictional areas (wetlands) within their property in Rio Grande, Puerto Rico. The CTPR is involved in the process as a third party mitigator to whom PPI will provide the funding for the design and execution of a mitigation plan.

Given the critical value of the limited available natural protected lands in the small islands of Puerto Rico and the critical habitat restoration projects underway at Hacienda La Esperanza Nature Reserve, financed with federal funding, we respectfully request that a comprehensive alternative production and distribution plan be explored for this project so as to identify the best method, location and route that would attain AEE goals and objectives. Furthermore, given the high risk and security issues related with gas pipelines on human and other natural life, this project should have the most rigorous standard, which is usually not compatible with a fast track approach. The CTPR recognizes interest that the Puerto Rico Electric Power Authority have represented in utilizing cleaner fossil fuels, yet the impact of over 1,100 acres of open and forested lands throughout a 93 miles stretch, in an island with its longest stretch being 100 miles, is without doubt a extremely high impact project that deserves careful and thoughtful review.

If you need additional information you may contact us at the address above, or telephone (787) 722-5834.

Cordially,

Fernando Lloveras San Miguel, Esq.
Executive Director