

# **APPENDIX E**

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## **Public and Agency Project Comments and Corps' Responses**

### **Environmental Assessment Rio Culebrinas, Puerto Rico Study**



**US Army Corps of Engineers  
JACKSONVILLE DISTRICT**

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**Table 1.** Summary of U.S. Army Corps of Engineers (Corps) responses to comments received during the agency and public review and comment period of the proposed Finding of No Significant Impact (FONSI) and draft Environmental Assessment (EA) for Rio Culebrinas, Puerto Rico Study project.

#	Commenter	Comentario	Comment	Response
1	Ramonita Mendez & Ada N. Ortiz Torres	...la Comunidad Tablonal, quien es una de las más afectadas por las inundaciones debido a la cercanía del Río Culebrinas, no ha sido tomada en consideración para este estudio de control de inundaciones, pero, al contrario, se le incrementan las inundaciones con el supuesto “control de inundaciones”.	<i>Translated from Spanish</i> The Tablonal Community, who is one of the most affected by the floods due to the proximity of the Culebrinas River, has not been taken consideration for this flood control study, but, on the contrary, it is likely that the project will increase flooding in the area.	The Tablonal community was identified as a potential project area in the 2004 Detailed Project Report (DPR) and Environmental Assessment (EA). Preliminary Plan 1 proposed construction of a levee adjacent to the Tablonal community, however, this measure would require relocation of hundreds of structures in the area, resulting in a benefit to cost ratio of less than one for this portion of the project. For this reason, measures for the Tablonal community could not be carried forward.  The Corps will conduct an updated hydrology and hydraulic (H&H) study during the project’s Preconstruction Engineering Design (PED) phase.
2	Ramonita Mendez & Ada N. Ortiz Torres	Desconocemos si los estudios que se han realizado, en especial el HH ( <i>Hydrology and Hydraulic Study</i> ), están actualizados conforme a las inundaciones ocasionadas por el HURACAN MARIA. ... Desconocemos si este dato de las marejadas ciclónicas fue tomado en consideración al realizar el estudio. De no haber sido así solicitamos sean analizadas en el estudio HH.	<i>Translated from Spanish</i> We do not know if the data from the Hurricane Maria storm surges were taken into consideration when conducting the study. If not, we request analyzed in the HH study.	The project’s design is based upon the 100-year flood event, and a storm surge of four meters. The recommended design protects from flooding larger than any previous event Maria, Georges, and Eloisa. Hurricane Maria was a 30-year flood event; storm Georges and Eloisa were 10-year storm events. The Corps will conduct an updated H&H study during the project’s PED phase.

#	Commenter	Comentario	Comment	Response
3	Ramonita Mendez & Ada N. Ortiz Torres	El hidrólogo en su estudio HH expresó en vista pública que tanto los diques que proponía el Cuerpo de Ingenieros en aquel entonces como los dique que proponía realizar el desarrollador del DBR&M (similares a los diques actuales del USCoE), ambos diseños incrementarían las inundaciones para la Comunidad de Tablonal. Esto como consecuencia, pone en riesgo la seguridad de la vida y propiedades de los residentes no sólo de la Comunidad de Tablonal sino de la Comunidad de Espinar de Aguada.	<i>Translated from Spanish</i> The study's hydrologist expressed in a public setting that the proposed levees would increase flooding for the Tablonal Community. As a result, this puts at risk the safety of life and properties of residents not only of the Community of Tablonal but of the Community of Espinar de Aguada.	As part of the 2004 DPR and EA, the H&H analysis results showed minimal flood stage increase to areas of Tablonal which are already in the flood zone.  The Corps will conduct an updated H&H study during the project's PED phase to re-evaluate project effects on the flood stage for the Tablonal community.
4	Ramonita Mendez & Ada N. Ortiz Torres	Por tanto, la Comunidad Tablonal se opone a la construcción de esos diques que diseña el Cuerpo de Ingenieros. SI EL ESTUDIO ES UNO DE CONTROL DE INUNDACIONES, NO SE LE DEBE INCREMENTAR LAS INUNDACIONES A NINGUNA DE LAS COMUNIDADES. (énfasis suplido). (Véase comunicación del USCOE del 29 de septiembre de 2015 que se acompaña.)	<i>Translated from Spanish</i> The Tablonal Community opposes the construction of project IF THE STUDY IS ONE OF FLOOD CONTROL, IT SHOULD NOT INCREASE FLOODING TO ANY OF THE COMMUNITIES (emphasis added). (See attached USACE email from September 29, 2015.)	As part of the 2004 DPR and EA, the H&H analysis results showed minimal flood stage increase to areas of Tablonal which are already in the flood zone.  The Corps will conduct an updated H&H study during the project's PED phase to re-evaluate project effects on the flood stage for the Tablonal community.

#	Commenter	Comentario	Comment	Response
5	Ramonita Mendez & Ada N. Ortiz Torres	...entendemos que este estudio de control de inundaciones debe ser llevado a cabo con participación ciudadana, particularmente aquellas que se verán severamente impactadas como las Comunidades Tablonal y Espinar de Aguada.	<i>Translated from Spanish</i> We understand that this flood control study must be carried out with citizen participation, particularly those that will be severely impacted as the Tablonal and Espinar de Aguada Communities.	The Corps will conduct additional public meetings to present and discuss the project's status and design, as well as provide the opportunity for public participation. These meetings will be held during the project's PED phase.

6	Ramonita Mendez & Ada N. Ortiz Torres	Entendemos que la construcción de esos diques no corrigen las inundaciones, en especial las que recibimos durante el huracán y las que provienen de las marejadas ciclónicas, más bien, lo que harán será obstaculizar el libre discurrir de las aguas. No sólo con eso, se proponen afectar negativamente unas áreas (10.25 cuerdas) de humedales que sirven de protección y control de inundaciones natural (infraestructura verde).	<p><i>Translated from Spanish</i></p> <p>We understand that the construction of the project does not correct floods, especially those that we received during the hurricane and those that come from the storm surges, rather, what they will do is impede the free flow of water. Not only that, but 10.25 acres of wetlands that serve as protection and natural flood control (green infrastructure) will be negatively affected.</p>	<p>The project's design is based upon the 100-year flood event, and a storm surge of four meters. The recommended design protects from flooding larger than any previous event Maria, Georges, and Eloisa. Hurricane Maria was a 30-year flood event; storm Georges and Eloisa were 10-year storm events.</p> <p>The Corps will conduct an updated H&amp;H study during the project's PED phase.</p> <p>The Corps will mitigate for unavoidable impacts to wetlands. The 2015 DPR Draft Addendum and EA proposed a conceptual mitigation plan which would create approximately 13 acres of wetlands. (A portion of the plan included excavation in existing wetlands to ensure hydrologic connection; therefore, the total net creation would be approximately 11 – 12 acres of wetlands.) The Corps prepared a 2019 proposed mitigation plan (included as the 2020 EA's Appendix D), which builds upon the 2015 DPR Draft Addendum's conceptual mitigation plan. The Corps will conduct a wetland habitat functional analysis during the project's PED phase to verify that the functional equivalent is still valid and ensure the appropriate performance measures are in place. Detailed calculations and exact acreages are not expected to change by more than 50% from the project's conceptual mitigation plan proposed in the 2015 DPR Draft Addendum. The final mitigation plan will be coordinated with the U.S. Fish and Wildlife Service (USFWS) as well as the Puerto Rico Department of Natural and Environmental Resources (DNER). The plan will be developed by the Corps and provided to partner agencies for review and comment. The mitigation plan</p>
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#	Commenter	Comentario	Comment	Response
				will be finalized during the design phase when the project is reviewed on Biddability, Constructability, Operability, Environmental and Sustainability (BCOES) characteristics.
7	Ramonita Mendez & Ada N. Ortiz Torres	El Cuerpo de Ingenieros debe desarrollar un proyecto de control de inundaciones que proteja a las tres comunidades: Tablonal, Espinar y Victoria. Las inundaciones del Río Culebrinas afectan principalmente a las comunidades de Tablonal y Espinar de Aguada.	<i>Translated from Spanish</i> The Corps of Engineers must develop a flood control project that protects the three communities: Tablonal, Espinar, and Victoria. The flooding from the Rio Culebrinas affect mainly the communities of Tablonal and Espinar de Aguada.	The Tablonal community was identified as a potential project area in the 2004 DPR and EA. Preliminary Plan 1 proposed construction of a levee adjacent to the Tablonal community, however, this measure would require relocation of hundreds of structures in the area, resulting in a benefit to cost ratio of less than one for this portion of the project. For this reason, measures for the Tablonal community could not be carried forward.  The Corps will conduct an updated H&H study during the project's PED phase.
8	Ramonita Mendez & Ada N. Ortiz Torres	Por lo que solicitamos que se celebren vistas públicas para que el proyecto sea presentado y discutido con la comunidad ya que nos oponemos a la construcción de estos diques y solicitamos que todos los estudios estén actualizados conforme a los hechos ocurridos luego del paso del Huracán María, tomando en consideración las marejadas ciclónicas que ocurrieron.	<i>Translated from Spanish</i> Therefore, we ask that you conduct public meetings so that the project can be presented and discussed with the community since we oppose the construction of the study. We request that all studies be updated according to the events that occurred later of the passage of Hurricane Maria, taking into account the storm surges that they happened.	The Corps will conduct additional public meetings to present and discuss the project's status and design as well as provide the opportunity for public participation. These meetings will be held during the project's PED phase.  In order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be refined during the PED phase. The project, as it is currently described and designed, is environmentally acceptable; however, if during PED changes to the project result in effects that have not been previously evaluated, then pursuant to the National Environmental Policy Act (NEPA), the Corps will prepare a separate NEPA document to address the changes and evaluate the associated effects.

#	Commenter	Comentario	Comment	Response
9	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	This project requires an Environmental Impact Statement (EIS) to comply with Federal (“National Environmental Policy Act”) and Puerto Rico guidelines and regulations.	<p>Pursuant to NEPA, the Corps has completed agency review of this project. The Corps will complete mitigation for unavoidable impacts to wetlands and has determined that an EIS is not required. The Corps prepared a proposed mitigation plan for this project (provided as Appendix D to the 2020 EA), which builds upon the 2015 DPR Draft Addendum’s conceptual mitigation plan. The Corps will conduct a wetland habitat functional analysis during the project’s PED phase to verify that the functional equivalent is still valid and ensure the appropriate performance measures are in place. Detailed calculations and exact acreages are not expected to change by more than 50% from the project’s conceptual mitigation plan proposed in the 2015 DPR Draft Addendum. The final mitigation plan will be coordinated with the USFWS as well as the DNER. The plan will be developed by the Corps and provided to partner agencies for review and comment. The mitigation plan will be finalized during the design phase when the project is reviewed on BCOES characteristics.</p> <p>In addition, the Corps’ will conduct additional public meetings during the PED phase to continue to present and discuss the project’s status and design as well as provide the opportunity for public participation.</p>

#	Commenter	Comentario	Comment	Response
10	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	This EA 2019, which adopts by reference the 2004 EA, does not include environmental information provided previously by local and federal agencies and/or necessary to evaluate the environmental impact of the proposed project.	Pertinent information provided by local and federal agencies through the NEPA process (i.e. agency comment periods, consultations, etc.) has been added to the 2019 draft EA prior to finalization.
11	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	The DNER published valuable environmental information regard the importance and ecological value of the Caño Madre Vieja in the Municipality of Aguada-Aguadilla. The information was fundamental to support the reserve's designation in 2016.	Thank you for including this information. On May 21, 2019, the Corps, DNER, Puerto Rico Planning Board (PRPB), and the mayors of Aguadilla and Aguada discussed the possible impacts of the project to the proposed Espinar Swamp Reserve. The project's 2020 EA considers concerns regarding the effects to the existing wetlands and the proposed reserve. It is the Corps' understanding that the proposed designation of the Espinar Swamp Reserve has not yet been finalized. Should the proposed designation become final, the Corps will work with the appropriate agencies to address any additional efforts that may be required.
12	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	This EA 2019 does not include information previously reported by the Department of Natural and Environmental Resources related to the presence of the habitat for the endangered marine turtle's species: <i>Dermodochelys coriacea</i> (Tinglar) and <i>Eretmodochelys imbricate</i> (Carey de Concha).	Thank you for including this information. The project occurs inland and will not affect these marine species.

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13	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	In 2013, US FWS stated that the Caño Madre Vieja area is composed of mangrove and freshwater wetlands (they did not mention that the wetlands are “degraded”). The wetlands associated with the area have been designated Coastal Barrier (PR-75 and PR-75P) and therefore, FEMA or disaster relief may not apply. The levees of the proposed flood control project are located in some coastal sections of these coastal barriers.	The project’s original design of the Espinar levee was later modified to end prior to reaching the coastal barrier segment PR-75. No effects to Coastal Barrier Resource System Units in the project area are expected.

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14	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	Wetlands located at the Caño Madre Vieja are healthy and there are no-known pollution sources impacting this coastal and riverine ecosystems. Depositing filling material in the Caño Madre Vieja wetlands and mangroves will destroy and disappear this important tropical ecosystem, affecting surrounding Aguada communities (Tablonal and Espinar) from floods, tsunamis and storm surges.	The Corps will mitigate for unavoidable impacts to wetlands. The 2015 DPR Draft Addendum and EA proposed a conceptual mitigation plan which would create approximately 13 acres of wetlands. (A portion of the plan included excavation in existing wetlands to ensure hydrologic connection; therefore, the total net creation would be approximately 11 – 12 acres of wetlands.) The Corps prepared a 2019 proposed mitigation plan (included as the 2020 EA's Appendix D), which builds upon the 2015 DPR Draft Addendum's conceptual mitigation plan. The Corps will conduct a wetland habitat functional analysis during the project's PED phase to verify that the functional equivalent is still valid and ensure the appropriate performance measures are in place. Detailed calculations and exact acreages are not expected to change by more than 50% from the project's conceptual mitigation plan proposed in the 2015 DPR Draft Addendum. The final mitigation plan will be coordinated with the USFWS as well as DNER. The plan will be developed by the Corps and provided to partner agencies for review and comment. The mitigation plan will be finalized during the design phase when the project is reviewed on BCOES characteristics. The Corps will also conduct an updated H&H study during the project's PED phase.

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15	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	The EA 2019 stated that “approximately 84,101 cubic meters (110,000 cubic yards) of fill” should not result in violations of water quality standards (physical and chemical parameters of the aquatic ecosystem). The water quality standards for the six parameters mentioned in this appendix will be altered when the Caño Madre Vieja will be filled with soil, sediments and other filling materials.	The water quality standard parameters have been reviewed and updated to more accurately reflect the alterations in substrate and water caused by interruption of the Caño Madre Vieja by the levees as well as the construction of the cutoff channel.
16	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	This EA 2019 did not include information or communications from the PR Department of Agriculture (DA), and only includes an old communication from NRCS (year 2002) about federal compliance.	The PRDA is coordinated with through the public and agency review process. The final EA has been updated to reflect recent coordination with the Natural Resources Conservation Service (NRCS).  In addition to the draft EA’s public and agency review process, PRPB also conducts a separate public and agency review for the project under the Coastal Zone Management Program.

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17	Dr. Ana J. Navarro	<i>(Comments provided in English)</i>	We recommended an updated of the scientific and environmental information throughout an Environmental Impact Statement that includes community participation, especially the “ <i>environmental justice</i> ” communities’ that will be impacted with the proposed project.	<p>In order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be refined during the PED phase. The project, as it is currently described and designed, is environmentally acceptable; however, if during PED changes to the project result in effects that have not been previously evaluated, then pursuant to NEPA, the Corps will prepare a separate NEPA document to address the changes and evaluate the associated effects.</p> <p>The Corps will conduct additional public meetings to present and discuss the project’s status and design as well as provide the opportunity for public participation. These meetings will be held during the project’s PED phase.</p>
18	Jorge R. Sepulveda Torres	Recomendamos estudios recientes ya que los estudios que se hicieron para el proyecto en el 2004 caducaron y son obsoletos.	<p><i>Translated from Spanish</i></p> <p>We recommend recent studies since the studies that were done for the project in 2004 they expired and are obsolete.</p>	<p>The Corps will conduct an updated H&amp;H study during the project’s PED phase.</p> <p>Additionally, in order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be refined during the PED phase. The project, as it is currently described and designed, is environmentally acceptable; however, if during PED changes to the project result in effects that have not been previously evaluated, then pursuant to NEPA, the Corps will prepare a separate NEPA document to address the changes and evaluate the associated effects.</p>

19	Jorge R. Sepulveda Torres	<p>Consideramos que el proyecto tiene un impacto ambiental significativo, por tanto, no es correcto el argumento de que la obra seria de NO impacto ambiental cuando altera significativamente la Reserva Natural del Caño Madre Vieja. La propuesta no ha tomado en consideración el daño que la obra le causaría a la Reserva Natural.</p>	<p>We consider that the project has a significant environmental impact, therefore, the argument that the work would be of NO environmental impact is not correct when it significantly alters the Caño Madre Vieja Natural Reserve. The proposal has not taken into consideration the damage that the work would cause to the Reserve Natural.</p>	<p>Pursuant to NEPA, the Corps has completed agency review of this project. The Corps will complete mitigation for unavoidable impacts to wetlands and has determined that an EIS is not required. The 2015 DPR Draft Addendum and EA proposed a conceptual mitigation plan which would create approximately 13 acres of wetlands. (A portion of the plan included excavation in existing wetlands to ensure hydrologic connection; therefore, the total net creation would be approximately 11 – 12 acres of wetlands.) The Corps prepared a 2019 proposed mitigation plan (included as the 2020 EA's Appendix D), which builds upon the 2015 DPR Draft Addendum's conceptual mitigation plan. The Corps will conduct a wetland habitat functional analysis during the project's PED phase to verify that the functional equivalent is still valid and ensure the appropriate performance measures are in place. Detailed calculations and exact acreages are not expected to change by more than 50% from the project's conceptual mitigation plan proposed in the 2015 DPR Draft Addendum. The final mitigation plan will be coordinated with the USFWS as well as DNER. The plan will be developed by the Corps and provided to partner agencies for review and comment. The mitigation plan will be finalized during the design phase when the project is reviewed on BCOES characteristics.</p> <p>In addition, the Corps' will conduct additional public meetings during the PED phase to continue to present and discuss the project's status and design as well as provide the opportunity for public participation.</p>
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				<p>On May 21, 2019, the Corps, DNER, PRPB, and the mayors of Aguadilla and Aguada discussed the possible impacts of the project to the proposed Espinar Swamp Reserve. The project's 2020 EA considers concerns regarding the effects to the existing wetlands and the proposed reserve. It is the Corps' understanding that the proposed designation of the Espinar Swamp Reserve has not yet been finalized. Should the proposed designation become final, the Corps will work with the appropriate agencies to address any additional efforts that may be required.</p>

20	Jorge R. Sepulveda Torres	La evaluación ambiental carece de datos ambientales específicos. La Agencia falla en realizar una Declaración de Impacto Ambiental (EIS, por sus siglas en ingles) que evalúe los verdaderos impactos ambientales del proyecto sobre el entorno de la Reserva Natural.	The environmental evaluation lacks specific environmental data. ... The Agency fails to issue an Environmental Impact Statement (EIS) that evaluates the true impacts of the project on the environment of the Natural Reserve.	<p>In order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be refined during the PED phase. The project, as it is currently described and designed, is environmentally acceptable; however, if during PED changes to the project result in effects that have not been previously evaluated, then pursuant to NEPA, the Corps will prepare a separate NEPA document to address the changes and evaluate the associated effects.</p> <p>The Corps will complete mitigation for unavoidable impacts to wetlands. The Corps prepared a proposed mitigation plan for this project (provided as Appendix D to the 2020 EA), which builds upon the 2015 DPR Draft Addendum's conceptual mitigation plan. The Corps will conduct a wetland habitat functional analysis during the project's PED phase to verify that the functional equivalent is still valid and ensure the appropriate performance measures are in place. Detailed calculations and exact acreages are not expected to change by more than 50% from the project's conceptual mitigation plan proposed in the 2015 DPR Draft Addendum. The final mitigation plan will be coordinated with the USFWS as well as the DNER. The plan will be developed by the Corps and provided to partner agencies for review and comment. The mitigation plan will be finalized during the design phase when the project is reviewed on BCOES characteristics.</p> <p>On May 21, 2019, the Corps, DNER, PRPB, and the mayors of Aguadilla and Aguada discussed the possible impacts of the project to</p>
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				<p>the proposed Espinar Swamp Reserve. The project's 2020 EA considers concerns regarding the effects to the existing wetlands and the proposed reserve. It is the Corps' understanding that the proposed designation of the Espinar Swamp Reserve has not yet been finalized. Should the proposed designation become final, the Corps will work with the appropriate agencies to address any additional efforts that may be required.</p>
21	Jorge R. Sepulveda Torres	<p>El Proyecto contemplaría la construcción de canales de desvío lo que aumentaría el flujo y la velocidad de las aguas de inundación hacia el Caño. No indican cuál sería el efecto del aumento en el flujo y la velocidad de las aguas de inundación sobre el manglar. Desconocemos si la Agencia ha realizado un estudio Hidrológico - Hidráulico (H-H) actualizado sobre como los diques alterarían el flujo natural de las aguas en la zona.</p>	<p>The project proposes the construction of diversion canals, which would increase the flow and speed of the flood waters towards the Caño. They do not indicate what the effect of the increased flow and speed of flood waters on the mangroves. We do not know if the Agency has carried out a Hydrological - Hydraulic (H-H) study updated on how the levees would alter the natural flow of water in the area.</p>	<p>The recommended project includes a 200 ft. long channel, to reconnect the portion of Caño Madre Vieja impacted by the footprint of the Aguadilla levee. The channel does not increase the flow nor the velocities in Caño Madre Vieja.</p> <p>The Corps will conduct an updated H&amp;H study during the project's PED phase.</p>

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22	Jorge R. Sepulveda Torres	<p>El documento indica que van a mitigar los humedales que van a impactar. Solo señalan que se afectarían 10.25 cuerdas donde ubicarían los diques. No mencionan el impacto a los humedales adyacentes que podrían verse afectados. Las excavaciones para la construcción de los canales y los diques podrían traer un aumento en la sedimentación y turbidez de las aguas del manglar y de la costa. Esto podría afectar toda la flora y fauna asociada al manglar y a la vida acuática. No está claro cuáles serían las medidas de control de sedimentación.</p>	<p>The document indicates that they will mitigate the wetlands that will impact. It only points out that 10.25 acres would be affected where the levees would be located. They do not mention the impact on adjacent wetlands that could be affected. The excavations for the construction of canals and dykes could bring an increase in sedimentation and turbidity of mangrove and coastal waters. This could affect all the flora and fauna associated with the mangrove and aquatic life. It is not clear which would be the sedimentation control measures.</p>	<p>In order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be refined during the PED phase. The project, as it is currently described and designed, is environmentally acceptable; however, if during PED changes to the project result in effects that have not been previously evaluated, then pursuant to NEPA, the Corps will prepare a separate NEPA document to address the changes and evaluate the associated effects.</p> <p>The Corps will complete mitigation for unavoidable impacts to wetlands. The Corps prepared a proposed mitigation plan for this project (provided as Appendix D to the 2020 EA), which builds upon the 2015 DPR Draft Addendum's conceptual mitigation plan. The Corps will conduct a wetland habitat functional analysis during the project's PED phase to verify that the functional equivalent is still valid and ensure the appropriate performance measures are in place. Detailed calculations and exact acreages are not expected to change by more than 50% from the project's conceptual mitigation plan proposed in the 2015 DPR Draft Addendum. The final mitigation plan will be coordinated with the USFWS as well as the DNER. The plan will be developed by the Corps and provided to partner agencies for review and comment. The mitigation plan will be finalized during the design phase when the project is reviewed on BCOES characteristics.</p>

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23	Jorge R. Sepulveda Torres	El Cuerpo de Ingenieros no toma en consideración las marejadas ciclónicas y los cambios acontecidos en la zona marítima terrestre provocados por la erosión costera y por el paso del Huracán María. Este huracán provocó marejadas ciclónicas que se elevaron hasta 15 pies. Tampoco muestran estudios que indiquen cual sería el efecto que causarían los diques bajo un escenario similar.	The Corps of Engineers does not take into account storm surges and changes in the maritime zone caused by coastal erosion and by the passage of Hurricane Maria. This hurricane caused cyclonic storm surges that rose up to 15 feet. They also do not show studies that indicate what the effect that the levees will cause under a similar scenario.	<p>The project's design is based upon the 100-year flood event, and a storm surge of four meters. The recommended design protects from flooding larger than any previous event Maria, Georges, and Eloisa. Hurricane Maria was a 30-year flood event; storm Georges and Eloisa were 10-year storm events. The Corps will conduct an updated H&amp;H study during the project's PED phase.</p> <p>The feasibility study considered storm surges in the analysis. The proposed levees have no effect on storm surges produced by wave storms or hurricanes. The proposed levees will provide high ground that could be used as an escape route for residents during storm surge events and tsunamis.</p>

#	Commenter	Comentario	Comment	Response
24	Jorge R. Sepulveda Torres	<p>El Proyecto de Control de Inundaciones está diseñado para proteger solo dos comunidades. Sin embargo, no advierte como afectaría el cambio en el flujo de las aguas a otras comunidades que nunca han sido consideradas en el Proyecto (Comunidad Tablonal y Espinar de Aguada). Los proyectos de controles de inundaciones no deberían hacerse para proteger a unos y perjudicar a otros. No se puede tener consideraciones discriminatorias a la hora de evaluar proyectos de control de inundaciones. No se deberían realizar proyectos de control de inundaciones que provoquen aumento en el nivel de inundaciones en otras comunidades aledañas.</p>	<p>The Flood Control Project is designed to protect only two communities. However, it does not state how the change in the flow of water would affect other communities that have never been considered in the Project. (Tablonal Community and Espinar de Aguada). Flood control projects should not be done to protect some and harm others. You cannot have discriminatory considerations when evaluating projects of flood control. Flood control projects should not be carried out that cause an increase in the level of flooding in other nearby communities.</p>	<p>The Tablonal community was identified as a potential project area in the 2004 DPR and EA. Preliminary Plan 1 proposed construction of a levee adjacent to the Tablonal community, however, this measure would require relocation of hundreds of structures in the area, resulting in a benefit to cost ratio of less than one for this portion of the project. For this reason, measures for the Tablonal community could not be carried forward.</p> <p>As part of the 2004 DPR and EA, the H&amp;H analysis results showed minimal flood stage increase to areas of Tablonal which are already in the flood zone.</p> <p>The Corps will conduct an updated H&amp;H study during the project's PED phase to re-evaluate project effects on the flood stage for the Tablonal community.</p>

25	Jorge R. Sepulveda Torres	<p>Después de evaluar la propuesta considero que si la Agencia tiene un genuino interés en construir un proyecto para el control de inundaciones debe considerar a todas las comunidades que se verían afectadas. Por lo que se debe realizar un proceso abierto y participativo que se pueda canalizar por medio de vistas públicas. Se debe comenzar realizando nuevos estudios basados en las circunstancias actuales y descartando los estudios anteriores, dado que este proyecto impactará terrenos de alto valor ecológico y agrícola. El Cuerpo de Ingenieros tiene que incluir un estudio de impacto ambiental federal (NEPA) que evalúe todos los impactos ambientales reales sobre todos los recursos que impactaría. Deben también hacer un estudio hidrológico-hidráulico (HH) nuevo que evidencie como impactaría la obra y un estudio sobre la inundación costera tomando en consideración eventos catastróficos como el ocurrido tras el paso del huracán María. Estamos en la mejor disposición de participar y colaborar con la Agencia Federal en este proceso.</p>	<p>After evaluating the proposal, I consider that if the Agency has a genuine interest in building a flood control project should consider all communities that would be affected. Therefore, an open and participatory process must be carried out can channel through public views. It should start with new studies based on current circumstances and discarding previous studies, given that this project will impact land of high ecological and agricultural value. The Corps of Engineers has to include a federal environmental impact study (NEPA) that evaluates all impacts real environmental factors over all the resources that would impact. They should also do a study hydrological-hydraulic (HH) new that evidenced how the work would impact and a study on the coastal flooding taking into consideration catastrophic events like the one that occurred after the passage of Hurricane Maria We are in the best disposition to participate and collaborate with the Agency Federal in this process.</p>	<p>The Corps has conducted multiple studies in the project area: 2004 DPR and EA, 2015 DPR Draft Addendum and EA, and the 2019 CAP Conversion Feasibility Report for Río Culebrinas, Puerto Rico Study (currently being finalized). The 2004 DPR identified the communities where structural measures would be viable. Measures on the Tablonal Community could not be economically justified as it resulted in a benefit to cost ratio of less than one for this portion of the project.</p> <p>The Corps will conduct additional public meetings to present and discuss the project's status and design as well as provide the opportunity for public participation. These meetings will be held during the project's PED phase.</p> <p>In order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be refined during the PED phase. The project, as it is currently described and designed, is environmentally acceptable; however, if during PED changes to the project result in effects that have not been previously evaluated, then pursuant to NEPA, the Corps will prepare a separate NEPA document to address the changes and evaluate the associated effects. The Corps will also conduct an updated H&amp;H study during the project's PED phase.</p>
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