

PUERTO RICO COASTAL

DRAFT INTEGRATED FEASIBILITY REPORT AND ENVIRONMENTAL ASSESSMENT

APPENDIX H

Pertinent Correspondence

Attachment 1 – Sponsor Coordination

Attachment 2 – Agency Coordination

Attachment 3 – Comments & Responses – Draft Report November 2020



June 2023



**US Army Corps
of Engineers®**
Jacksonville District

APPENDIX H – PERTINENT CORRESPONDENCE

ATTACHMENT 1 – SPONSOR COORDINATION



GOVERNMENT OF PUERTO RICO
DEPARTMENT OF NATURAL AND ENVIRONMENTAL RESOURCES

DEC 27 2022

Mr. Jerry T. Murphy, P.E., PMP
Deputy District Engineer for Programs and Project Management
Programs and Project Management Division
Water Resources Branch
Corps of Engineers (USACE)
Jacksonville District
Department of the Army
701 San Marco Boulevard
Jacksonville, Florida 32207-8175

VIA EMAIL: jerry.t.murphy@usace.army.mil, ashleigh.h.fountain@usace.army.mil,
milan.a.mora@usace.army.mil, stacey.l.roth@usace.army.mil

Dear Mr. Murphy:

**GOVERNOR'S DETERMINATION ON PROPOSED ALTERNATIVES FOR THE
PUERTO RICO COASTAL STUDY**

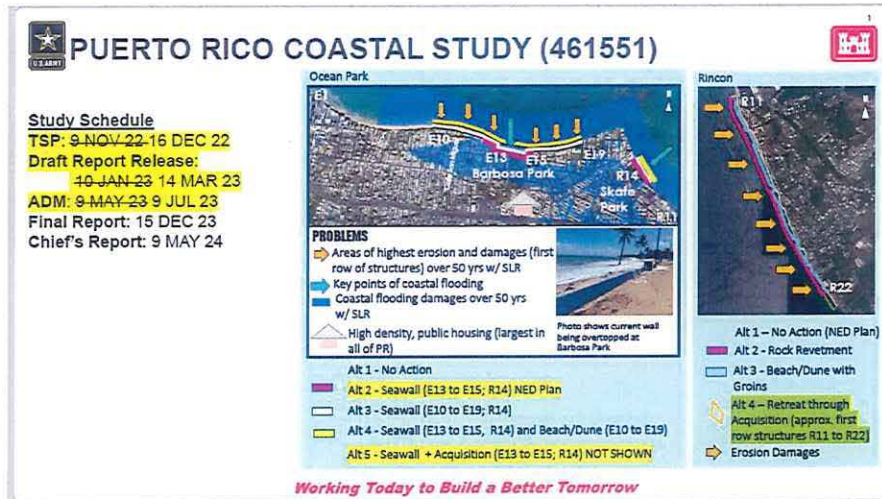
In the meeting held on December 2, 2022, the United States Army Corps of Engineers (USACE) presented to the Governor of Puerto Rico Pedro R. Pierluisi-Urrutia, the results of the Puerto Rico Coastal Study evaluations in two specific areas: Rincón and Ocean Park. The purpose of the Study is to identify alternatives to manage the problems generated by coastal erosion in both places and improve the resilience of the communities and coastal resources.

After having carefully evaluated the alternatives presented, Governor Pedro R. Pierluisi-Urrutia determined that the alternatives endorsed by the Government of Puerto Rico would be the following:

- Ocean Park- Alternative #2 Seawall (E13 to E15; R14) NED Plan
- Rincón- Alternative #4 – Retreat through Acquisition (approx. first row structures R11 to R22)

See the attached presentation slide.

DEC 27 2022



We advance the determination by this means and we hope to be able to discuss them in detail at the next meeting scheduled for January 12, 2023.

We are attaching to this communication, information that was previously requested for use in the cost-benefit analysis (Room tax, Airbnb and Hotels estimate in Ocean Park and Rincon). We regret not having sent it earlier, but it was received by email on December 16, 2022. For more information regarding this matter, please feel free to contact Graham A. Castillo, President and COO of Estudios Técnicos, Inc. at gcastillo@estudios tecnicos.com

Thank you for the opportunity to further discuss these topics. We are looking forward to meeting in the afternoon of January 12, 2023.

Cordially,

Anaïs Rodríguez-Vega
Secretary

Enclosure: Email provided by Estudios Técnicos Inc.

fc: Ashleigh H. Fountain, Project Manager
Milan A. Mora, P.E., Chief, Water Resources Branch, Programs and Project Management Division
Stacey L. Roth, P.E, Chief, Coastal-Navigation Plan Formulation Section



GOVERNMENT OF PUERTO RICO

Department of Natural and Environmental Resources

August 30, 2018

Colonel Andrew D. Kelly
Commander, Jacksonville District
U.S. Army Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32223-0019

Dear Colonel Kelly:

With respect to the recently passed Bipartisan Budget Act of 2018 (Public Law 115-123), the Department of Natural and Environmental Resources (DNER) is willing and able to participate as the Sponsor for the Puerto Rico Coastal Study in partnership with the U.S. Army Corps of Engineers (USACE), to cooperatively assess Island-wide coastal and beach erosion trends, causes, associated forcing, as well as to conduct focused assessments for the Rincón-Mayaguez-Cabo Rojo segment including sediment budget analysis, sand sources, and to coordinate, plan, and prioritize appropriate responses to erosion in the Rincón-Mayaguez-Cabo Rojo segment. This project will be funded under USACE Authorities at 100% federal cost. Final Scope of Work will be jointly developed by USACE and DNER.

The DNER understands that a study cannot be initiated unless it is selected as a viable study with associated allocation of Federal funds provided through Public Law 115-123. If selected, we intend to sign a study agreement, and concur with the draft provided by USACE, to initiate the study with USACE. It is our understanding that the agreement will target completion of the feasibility study within 3 years at a total cost of no more than \$3 million. After signing the agreement, a Project Management Plan will be developed and agreed upon by our agency and USACE. The study will be conducted and managed by USACE. The cost-sharing for the study, with funds from Public Law 115-123, will be 100% Federal.

Our agency is aware that this letter constitutes an expression of intent to initiate a study partnership to address the specified water resources problems and is not a contractual obligation. We understand that work on the study cannot commence until it is included in the Administration's request, funds are allocated by the Office of Management and Budget, and an agreement is signed. It is understood that we or USACE may opt to



discontinue the study at any time after the agreement is signed but will commit to work together as partners from the scoping phase, and subsequent decision points throughout the feasibility study, on providing the necessary support to risk-informed decision making. If it is determined that additional time or funding is necessary to support decisions to be made in order to complete the study, our agency will work with USACE to determine the appropriate course of action.

We also understand that if the results of the feasibility study culminate in a project that is found to be to be technically feasible, economically justified, and environmentally acceptable, that the Report of the Chief of Engineers could potentially make the project available for Preconstruction Engineering and Design and eventual Construction under Public Law 115-123, subject to the availability of funds. We are prepared to work with USACE as these situations develop and are prepared to engage in negotiations on future agreements and potential Operations and Maintenance obligations as this project moves forward.

If you require additional information, please contact: Ernesto L. Díaz at (787) 999-2200, extension 2730 and/or ediaz@drna.pr.gov.



Tania Vázquez Rivera
Secretary



GOVERNMENT OF PUERTO RICO

Department of Natural and Environmental Resources

August 30, 2018

Colonel Andrew D. Kelly
Commander, Jacksonville District
U.S. Army Corps of Engineers
P.O. Box 4970
Jacksonville, FL 32223-0019

Dear Colonel Kelly:

With respect to the recently passed Bipartisan Budget Act of 2018 (Public Law 115-123), the Department of Natural and Environmental Resources is willing and able to participate as the Sponsor for the San Juan Metro Area Study in partnership with the U.S. Army Corps of Engineers (USACE), to cooperatively assess coastal and beach erosion trends, causes, ocean forcing, sediment budgets, sand sources, as well as to coordinate, plan, and prioritize appropriate responses to erosion in the San Juan Metro Area extending from El Escambrón, San Juan Municipality to Boca de Cangreho, Carolina Municipality. This project will be funded under USACE Authorities at 100% federal cost. Final Scope of Work will be jointly developed by USACE and DNER.

Our agency understands that a study cannot be initiated unless it is selected as a viable study with associated allocation of Federal funds provided through Public Law 115-123. If selected, we intend to sign a study agreement, and concur with the draft provided by USACE, to initiate the study with USACE. It is our understanding that the agreement will target completion of the feasibility study within 3 years at a total cost of no more than \$3 million. After signing the agreement, a Project Management Plan will be developed and agreed upon by our agency and USACE. The study will be conducted and managed by USACE. The cost-sharing for the study, with funds from Public Law 115-123, will be 100% Federal.

Our agency is aware that this letter constitutes an expression of intent to initiate a study partnership to address the specified water resources problems and is not a contractual obligation. We understand that work on the study cannot commence until it is included in the Administration's request, funds are allocated by the Office of Management and Budget, and an agreement is signed. It is understood that we or USACE may opt to discontinue the study at any time after the agreement is signed but will commit to work



together as partners from the scoping phase, and subsequent decision points throughout the feasibility study, on providing the necessary support to risk-informed decision making. If it is determined that additional time or funding is necessary to support decisions to be made in order to complete the study, our agency will work with USACE to determine the appropriate course of action.

We also understand that if the results of the feasibility study culminate in a project that is found to be technically feasible, economically justified, and environmentally acceptable, that the Report of the Chief of Engineers could potentially make the project available for Preconstruction Engineering and Design and eventual Construction under Public Law 115-123, subject to the availability of funds. We are prepared to work with USACE as these situations develop and are prepared to engage in negotiations on future agreements and potential Operations and Maintenance obligations as this project moves forward.

If you require additional information, please contact: Ernesto L. Díaz at (787) 999-2200, extension 2730 and/or ediaz@drna.pr.gov.



Tania Vázquez Rivera
Secretary

APPENDIX H – PERTINENT CORRESPONDENCE

ATTACHMENT 2 – AGENCY COORDINATION



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
CIVIL WORKS
108 ARMY PENTAGON
WASHINGTON, DC 20310-0108

SACW

8 May 2023

MEMORANDUM FOR COMMANDING GENERAL, U.S. ARMY CORPS OF ENGINEERS

SUBJECT: Puerto Rico Coastal Storm Risk Management (CSRM) Feasibility Study, Puerto Rico, National Economic Development (NED) Plan Exception Request

1. Reference HQ, USACE, CECW-SAD memorandum (Puerto Rico Coastal Storm Risk Management Feasibility Study, Puerto Rico Comprehensive Benefits Exception Request), 8 March 2023.
2. I am responding to your memorandum requesting an exception to the requirement to recommend the NED plan and allow the U.S. Army Corps of Engineers (Corps) to recommend a plan that includes a non-economically justified separable element based on other social effects and environmental quality benefits.
3. My staff has reviewed the memorandum and recommendations by the South Atlantic Division Commander and the assessment by Corps Headquarters and has concluded that providing non-structural solutions to the municipality of Rincón should be part of a storm risk management solution for Puerto Rico. The Recommended Plan will advance Administration priorities in Puerto Rico, will provide long term resiliency to Rincón and provide important coastal beach habitat while addressing community concerns regarding the impacts of structural solutions. Implementation of the project without this separable element would result in a community impacted by environmental justice concerns being disproportionately impacted by storms. I approve the request to include the acquisition of 115 properties located in Rincón in the Recommended Plan.
4. While I approve the request, the Corps should continue actively engaging with the community to ensure all stakeholders are aware of potential requirements associated with implementation of the Recommended Plan. In addition, the Corps should work closely with the non-Federal sponsor to ensure that restrictive easements are incorporated to ensure that the acquired properties are not used for future development.
5. If there are any questions, your staff may contact Mr. Douglas J. Gorecki, Project Planning and Review at (571) 733-0066.

MICHAEL L. CONNOR
Assistant Secretary of the Army
(Civil Works)

CF:
CECW-ZA
CECW-ZB



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, JACKSONVILLE DISTRICT
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-8915

REPLY TO
ATTENTION OF

Planning and Policy Division
Environmental Branch

OCT 16 2018

A quien corresponda:

Esta carta de investigación inicial es publicada por el Distrito Jacksonville del cuerpo de Ingenieros de U.S (Corps) en cumplimiento de los requisitos de coordinación pública de la legislación nacional de política ambiental (NEPA). El propósito de esta correspondencia es iniciar formalmente el proceso de investigación y alcance según lo definido por 40 CFR 1501,7 para el estudio de reducción de daños por tormentas costeras en Puerto Rico. El propósito del período de investigaciones es iniciar el proceso público para la elaboración del documento NEPA para evaluar los efectos de las alternativas potenciales para reducir los daños causados por tormentas costeras a la infraestructura a lo largo de ciertos sectores costeros en Puerto Rico (Anejo 1).

La reunión de alcance público se llevará a cabo en Noviembre 6, 2018, en el Teatro Manuel Mendez Ballester, quinto piso de la Casa Alcadia, Avenida San Carlos #11, Aguadilla, Puerto Rico de 2:00 PM a 4:00 PM. Información adicional se encuentra disponible en nuestra página web de documentos ambientales en <https://www.saj.usace.army.mil/About/Divisions-Offices/Planning/Environmental-Branch/Environmental-Documents/>.

Las alternativas preliminares que se consideraran incluyen, pero no se limitan a, medidas de protección como revestimiento costero, rompeolas, y depósito de arena, así como medidas no estructurales. Recibiremos cordialmente sus opiniones, comentarios e información sobre los recursos ambientales y culturales, los objetivos de estudio y las características importantes dentro del área de estudio descrita, así como cualquier mejora sugerida. Las respuestas recibidas ayudarán a determinar el alcance del análisis y cualquier problema potencialmente significativo asociado con la reducción de daños por tormentas costeras en Puerto Rico. Las cartas con comentarios o peticiones deben ser enviadas a la dirección del membrete de esta carta, con atención a la División de Planificación de la Rama Ambiental y deben ser recibidas por esta oficina dentro de los 30 días siguientes a la fecha de la presente carta.

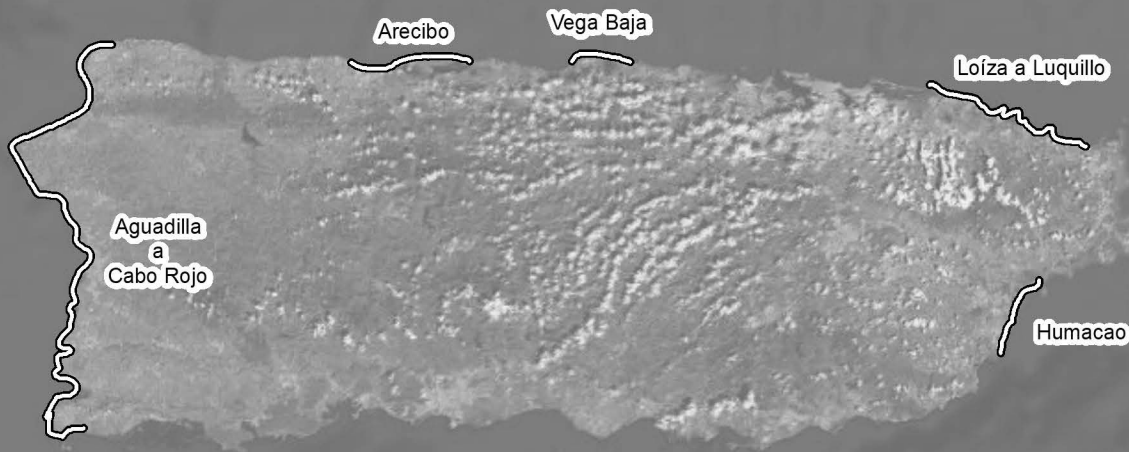
Para preguntas adicionales por favor comunicarse con Ms. Carolina Burnette al 904-232-1428 o enviar correo electrónico a carolina.burnette@usace.army.mil.

Sinceramente,



Gina Paduano Ralph, Ph.D.
Jefe, Rama Ambiental

Anejo




Estudio costero de Puerto Rico
Manejo de Riesgos de tormentas costeras
Posibles áreas de estudio

Puerto Rico



**US Army Corps
of Engineers**®
Jacksonville District

 Area de estudio

0 30 Kilometros

0 20 Millas





United States Department of the Interior



FISH AND WILDLIFE SERVICE

Caribbean Ecological Services

Field Office

P.O. Box 491

Boqueron, PR 00622

NOV 15 2018

In Reply Refer To:
FWS/R4/CESFO/MM-132

Dr. Gina Paduano Ralph
Chief, Environmental Branch
US Army Corps of Engineers
Jacksonville Division
60 Forsyth St. NW San Marco Boulevard
Jacksonville, Florida 32207-8915

Re: Puerto Rico Coastal Storm Damage Reduction
Study, Puerto Rico

Dear Dr. Paduano Ralph:

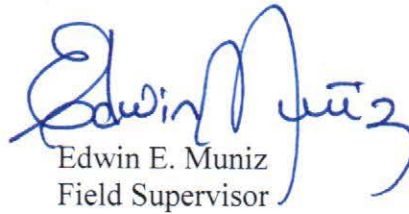
Thanks you for your letter dated October 16, 2018, requesting our agency to be a cooperating agency for the above referenced project in accordance to the National Environmental Policy Act (NEPA; Title 40 of the Code of Federal Regulations, part 1501.6), Executive Order 13807 ("One Federal Decision") and Section 1005 of the Water Resources Reform and Development Act (WRRDA) of 2014. Our comments are issued pursuant to the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*) and the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

The U.S. Army Corps of Engineers (USACE) is proposing a study for a project to reduce coastal storm damages to infrastructure along the coastline of the Commonwealth of Puerto Rico. Preliminary alternatives under consideration include, but are not limited to, shoreline revetment, breakwaters, and sand placement as well as non-structural measures.

The coastal areas of Puerto Rico are within the range of several coastal and marine federally listed species, including the Antillean manatee (*Trichechus manatus manatus*), the hawksbill sea turtle (*Eretmochelys imbricata*), leatherback sea turtle (*Dermochelys coriacea*), green sea turtle (*Chelonia mydas*), yellow-shouldered blackbird (*Agelaius xanthomus*), roseate tern (*Sterna dougallii dougallii*), piping plover (*Charadrius melodus*), rufa red knot (*Calidris canutus rufa*), and several listed plant species. Thus, consultation under Section 7(a)(2) will be required. Also, as part of the feasibility study, the impacts to wetlands and aquatic resources should be quantified. Once these impacts are estimated, a compensatory mitigation plan should be prepared and implemented. The Service will not be able to be a cooperating agency for the NEPA process; however, the Service will provide technical assistance regarding possible impacts to fish and wildlife resources.

It is our mission to work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of our people. If you have any questions or require additional information, please contact Marelisa Rivera, Deputy Field Supervisor at 787-851-7297 extension 206.

Sincerely yours,



Edwin E. Muniz
Field Supervisor

mtr



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, JACKSONVILLE DISTRICT
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-8915

JUN 05 2019

Planning & Policy Division
Plan Formulation Branch

To Whom it May Concern:

The purpose of this correspondence is to formally provide updates referent to the scoping process on the Puerto Rico Coastal Study. An open house meeting will be held on June 18, 2019, at the Ventana Al Mar Convention Center, Carretera 115 kilometro 12.9, Calle Muñoz Rivera in Rincon, Puerto Rico between 5:00 p.m. to 8:00 p.m.

This study will determine if there is Federal Interest in a plan for storm damage reduction to infrastructure along high risk coastal areas in Puerto Rico. The study originally considered 12 locations in San Juan, Vega Baja, Arecibo, Aguadilla, Aguada, Rincón, Añasco, Mayaguez, Cabo Rojo, Loiza, Luquillo, and Humacao. Narrowing of the study areas began with assessing areas with high density infrastructure at risk from coastal storms which would indicate high potential benefits under a Federal project. As a result of this preliminary screening, the Puerto Rico Coastal study will focus on parts of the San Juan and Rincon coastlines. The San Juan coastline encompasses approximately 8 miles of shoreline from El Boqueron to Boca de Cangrejos and the Rincon coastline from Punta Ensenada to just south of Stella (approximately 2.5 miles). In addition, the team will consider low cost alternatives that can be used to protect a segment of the major hurricane/tsunami evacuation routes in Mayaguez (PR-102) and Humacao (Hwy 3). More information about the preliminary scoping process and the areas of study is presented in the attached brochure.

Your attendance is greatly appreciated and we welcome your views, comments and information about the described study area, as well as any suggested improvements.

Quarterly updates and study documents can be found in the study webpage:
<https://www.saj.usace.army.mil/PuertoRicoCSRMEFeasibilityStudy/>

email: PuertoRicoCoastalStudy@usace.army.mil

Sincerely,

KEEFE.KELLY.J.1377265552

Digitally signed by

KEEFE.KELLY.J.13772655

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Date: 2019.06.05 16:15:06 -04'00'

Kelly J. Keefe
Chief, Plan Formulation Branch

Enclosure



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, JACKSONVILLE DISTRICT
701 SAN MARCO BOULEVARD
JACKSONVILLE, FLORIDA 32207-8915

JUN 06 2019

Planning & Policy Division
Plan Formulation Branch

A Quien Pueda Interesar:

El propósito de esta carta es para informar formalmente sobre actualizaciones referentes al proceso de alcance en el estudio costero de Puerto Rico. Una reunión abierta al público se celebrará el 18 de junio de 2019, en el Centro de Convenciones de Ventana Al Mar, Carretera 115 kilómetro 12.9, Calle Muñoz Rivera en Rincón, Puerto Rico de 5:00 p.m. a 8:00 p.m.

Este estudio determinará si existe Interés Federal en un plan para la reducción de daños por tormentas a la infraestructura a lo largo de zonas costeras de alto riesgo en Puerto Rico. El estudio originalmente consideró 12 localidades en San Juan, Vega Baja, Arecibo, Aguadilla, Aguada, Rincón, Añasco, Mayagüez, Cabo Rojo, Loíza, Luquillo y Humacao. La reducción de las áreas de estudio comenzó con la evaluación de áreas con alta densidad de infraestructura con riesgo a tormentas costeras que indicaran altos beneficios potenciales bajo un proyecto Federal. Como resultado de esta selección preliminar, el estudio costero de Puerto Rico se concentrará en segmentos de las costas de San Juan y Rincón. El segmento de la costa de San Juan abarca aproximadamente 8 millas desde el Boquerón a Boca de Cangrejos, y la costa de Rincón desde Punta Ensenada hasta la parte sur de Stella (aproximadamente 2.5 millas). Además, el equipo considerará alternativas de bajo costo que se pueden utilizar para proteger un segmento de las principales rutas de evacuación para huracanes y tsunamis en Mayagüez (PR-102) y Humacao (Hwy 3). Información adicional sobre el proceso de alcance preliminar y las áreas de estudio es presentada en el folleto adjunto.

Su asistencia es valiosa; y sus puntos de vista, comentarios e información sobre el área de estudio descrita, así como cualquier mejora sugerida son bienvenidos.

Las actualizaciones trimestrales y los documentos de estudio se pueden encontrar en la página web del estudio:

<https://www.saj.usace.army.mil/PuertoRicoCSRMFfeasibilityStudy/>

email: PuertoRicoCoastalStudy@usace.army.mil

Cordialmente,

KEEFE.KELLY.J.1377265552

Digitally signed by

KEEFE.KELLY.J.13772655

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Date: 2019.06.06 14:18:52 -04'00'

Kelly J. Keefe

Chief, Plan Formulation Branch

Adjunto

From: [Gabriel Pacheco](#)
To: [PuertoRicoCoastalStudy](#)
Subject: [Non-DoD Source] [Press] Rincón Storm Risk Management Feasibility Study
Date: Thursday, June 20, 2019 11:34:41 AM

Hello,

I was one of the journalists covering Tuesday's event at Ventana al Mar in Rincón, and wanted to follow-up with a few questions to add context to the story.

Taking into consideration that the USACE's solution could take between 5-8 years to be implemented, I know most of our readers at A Rinconvenient Truth will want to know if there are any other coastlines, similar to Rincón's western coastline (prone to sea-level rise, high-paced erosion, lots of surfing, medium property density and value), that the USACE has worked on and Rincoños can look at as "what could be possible" after the study is complete.

If I need to point my readers towards the before and after to coastline protection, what are the USACE's examples for each method (structural and non-structural solutions, one for each, please)?

Also, if you could remind me of the full names of the two main presenters (Burnette and Milán) and their official roles, I would greatly appreciate it as I'm working on a piece over the weekend.

Thanks,

--

Gabriel Pacheco Santa

Periodista (Journalist)

A Rinconvenient Truth <Blocked<https://www.arinconvenienttruth.com/>>

+17876172242

gabrielpacheco@arinconvenienttruth.com <<mailto:gabrielpacheco@arinconvenienttruth.com>>

From: [Lynn Spangler](#)
To: [PuertoRicoCoastalStudy](#)
Subject: [Non-DoD Source]
Date: Wednesday, June 19, 2019 2:32:01 PM

Where can I get info on the possibility of the Army revitalizing the beaches south of Rincon, Puerto Rico. Thank you, Lynn Spangler

From: [Rex Wamsley](#)
To: [PuertoRicoCoastalStudy](#)
Subject: [Non-DoD Source] Puerto Rico Coastal Storm Risk Management Feasibility Study
Date: Tuesday, January 14, 2020 10:54:51 AM

Can you provide us an update, or where we can find the latest, on the Puerto Rico shoreline reconstruction process (Risk Management Feasibility Study) for the Rincon, Puerto Rico area. This is part of the recovery program for Hurricane Maria.

Thank you.

Rex Wamsley

Sent from my iPhone

From: [Samuel Calvanese](#)
To: [PuertoRicoCoastalStudy](#)
Subject: [Non-DoD Source] Puerto Rico Coastal Storm Risk Management Feasibility Study
Date: Monday, April 20, 2020 6:38:09 AM

Good morning,

I want to follow up on the Puerto Rico Feasibility Study.

It appears per the website that a tentative milestone study update is due this month.

Are those details on target or has that changed?

Best regards,
Sam Calvanese

From: [Amaia Oiz](#)
To: [PuertoRicoCoastalStudy](#)
Subject: [Non-DoD Source] Puerto Rico Coastal Storm Risk Management Feasibility Study
Date: Thursday, September 26, 2019 7:00:16 PM

Hello. I would like to have a conversation about beach erosion. Would you be able to discuss this matter with me or direct me to someone who can? Thank you kindly.

Amaia Oiz
Marriage and Family Therapist #01520
Registered Yoga Teacher

775-750-0766

Blockedwww.ravenwellness.org <Blockedhttp://www.ravenwellness.org>

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From: [Marisol Jimenez](#)
To: [PuertoRicoCoastalStudy](#)
Subject: [Non-DoD Source] quarterly newsletter San Juan (Back Bay) Study
Date: Friday, June 21, 2019 11:03:38 AM

Hi, I'm a resident of the Condado lagoon area with serious flooding issues and I'm very hopeful this study will help our community. Can you please sign me up for the quarterly newsletter regarding the San Juan Back Bay Coastal Storm Study?

Thank you,

Marisol Jimenez

María S. Jiménez Meléndez Law Offices

P.O. Box 9023632
San Juan, P.R. 00902-3632
Tel. (787) 723-2455

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From: [Ariel Lugo](#)
To: [PuertoRicoCoastalStudy](#)
Cc: [Ruperto Chaparro Serrano](#); [Miguel F. Canals Silander](#); [Ernesto Diaz](#); [Tischa Munoz-Erickson](#)
Subject: [Non-DoD Source] Town Hall Meeting at Rincon, PR
Date: Wednesday, July 3, 2019 9:17:42 AM
Attachments: [Open House at Ventana al Mar.docx](#)

See Enclosed Comment.

Ariel E. Lugo
Tamesis #1528, El Paraiso
Rio Piedras, Puerto Rico 00926



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Caribbean Ecological Services Field Office
PO Box 491
Boquerón, PR 00622



In Reply Refer To:
FWS/R4/CESFO/MM-132

Ms. Angela E. Dunn
Chief, Environmental Branch
US Army Corps of Engineers, Jacksonville District
701 San Marco Blvd.
Jacksonville, FL 32207-8175

Re: Puerto Rico Coastal Study, Integrated
Feasibility Report and Environmental Assessment
(IFR/EA) San Juan, Puerto Rico and Endangered
Species Act Biological Assessment

Dear Ms. Dunn:

This is in reply to your January 19, 2021, letter initiating consultation under Section 7 of the Endangered Species Act (ESA) of 1973, as amended, for the Puerto Rico Coastal Storm Risk Management Study. Our comments are issued as technical assistance in accordance with the Endangered Species Act (16 U.S.C. 1531 et seq. as amended).

The US Army Corps of Engineers (Corps) draft Integrated Feasibility Report and Environmental Assessment (IFR/EA) evaluates reducing damages to infrastructure due to coastal flooding from storm surge and waves resulting from coastal storms and hurricanes. The Tentatively Selected Plan (TSP) consists of flooding and wave action reducing features for five areas, Condado Pocket Beach, Ocean Park Pocket Beach, Punta Piedrita Headland, Punta Las Marias Headland, and Rincon.

The Corps' December 2020 ESA Biological Assessment (BA) listed the following species within the action area under the jurisdiction of the USFWS: the threatened Antillean manatee (*Trichechus manatus manatus*), threatened nesting green sea turtle (*Chelonia mydas*), endangered nesting hawksbill sea turtle (*Eretmochelys imbricata*), and endangered nesting leatherback sea turtle (*Dermochelys coriacea*). There is no designated critical habitat under the jurisdiction of U.S. Fish and Wildlife Service (Service) within the action area.

The BA states that according to the Puerto Rico Department of Natural and Environmental Resources (DNER) reports of nesting sea turtles in Ocean Park and Condado, there are from 5 to 35 leatherback sea turtle nests in a given season (generally mid-February to August/September). This averages around 8 nests in a given season in Condado with most of the nesting occurring in Ocean Park and that the Rincon study area sees similar leatherback sea turtle nesting numbers.

In addition, the BA states that the study area has intermittent hawksbill sea turtle nesting activities, with very low numbers. The study area supports hard bottom and SAV (sea grass algae) habitat that provide important grazing areas for the green sea turtle. However, very few green sea turtles nest on the main island of Puerto Rico and there are no numbers for the study area.

With regards to the Antillean manatee the Corps' BA states that throughout the years, manatees have been recorded within the study area in San Juan but there is no data for Rincon. The Service's aerial survey data for manatees indicates that manatees have never been detected in Rincon during aerial surveys, but rather through public reports as mentioned in the BA. For the Condado-Pta. Las Marias areas, manatees have been documented both during aerial surveys and reported by the public.

Project description

Structural features included in the proposed TSP consist of approximately: 8,960 ft of beach nourishment. The one time truck haul beach nourishment at Condado and Ocean Park pocket beaches will be deposited above mean high water is also describe as "dune restoration" in some documents.

In addition, 10,850 ft of stone revetment and a breakwater field is being proposed for some areas of Condado, Ocean Park and Rincon. The final determination in terms of the quantity and siting of any compensatory mitigation would be conducted during the Pre-Construction Engineering and Design Phase of the project when site-specific survey data and the final designs are available. A preliminary mitigation plan is included in the draft IFR/EA as Appendix G.

Possible effects

The Corps anticipates that the proposed in-water project activities may affect manatee along the coastal waters, and proposes the implementation of conservation measures to minimize these potential effects.

The proposed beach nourishment with existing native beach sediments could reduce beach erosion effects and could possibly enhance sea turtle nesting habitat. The construction of breakwaters may adversely affect nesting and hatchling sea turtles by serving as a barrier or obstruction during ingress or egress at nesting sites.

In addition to the impacts evaluated by the Corps regarding beach nourishment, we are concerned with the following:

- 1) The potential sand sources for the proposed beach nourishment includes inland sand quarries, which may have the correct grain size, but the clay content is very critical. Beach sand does not contain clay, clay, when wetted can bind the sand grains and form a kind of pavement that is not usable for nesting sea turtles or hatching sea turtles. This usually requires a period of tilling the beach to help break up the pavement and wash out the clay, which is also disruptive to nesting sea turtles. As part of the consultation, the

Corps should evaluate the sand source for beach nourishment and its potential impacts to the beach as nesting habitat for sea turtles.

- 2) The proposed offshore breakwaters could eventually change the beach profile creating a tombolo effect with sand migrating to the breakwater and away from the shore. This could alter the nesting habitat potential of these beaches by altering the beach profile from a long sand beach to a series of scalloped beaches. As part of the consultation, the Corps should model the possible effects of proposed breakwaters on the sand migration patterns.

The BA provides conservation measures as well as the preliminary mitigation plan is included in the draft IFR/EA as Appendix G. The following measures to minimize impacts to manatees and sea turtles are:

- 1) To ensure manatees are not harmed by construction equipment, the contractor would adhere to the USFWS Standard Manatee Protection Measures for In-Water Work during construction. The Contractor may be held responsible for any manatee harmed, harassed, or killed as a result of vessel collisions or construction activities. Failure of the Contractor to follow these specifications is a violation of the Endangered Species Act and could result in prosecution of the Contractor under the ESA or the Marine Mammals Protection Act. The standard manatee conditions apply year-round in Puerto Rico.
- 2) The USACE will use the following measures outlined below during the construction of the proposed project:
 - a. Protected species observers during in-water work.
 - b. Shut-down of construction activities and monitoring should a turtle come within 50-feet until the animal leaves the area of its own volition.
- 3) For nesting sea turtles, the Corps will develop sea turtle avoidance and minimization measures including, in part, nest monitoring protocols similar to those used in Florida and included in the Statewide Programmatic Biological Opinion (SPBO) for shoreline activities along the coast of Florida (USFWS 2015). The SPBO includes sea turtle nest relocation from the active construction area before 9 am the morning following deposition. The Corps anticipates sea turtle nest monitoring would be required during construction and if possible, any sea turtle nests within the action area would be left in place, buffered and avoided. San Juan and Rincon primarily see leatherback sea turtle nesting so perhaps limiting construction to avoid the peak leatherback nesting season could further minimize impacts.

It is important to note that the any proposal to potentially relocate sea turtle nests on the proposed beach nourishment areas is considered a “take” under the ESA and therefore requires formal consultation and a Biological Opinion. The Statewide Programmatic Biological Opinion (SPBO) for shoreline activities along the coast of Florida (USFWS 2015) went through a formal consultation process and Biological Opinion with the Service.

Effect determination

The Corps has determined that the proposed project activities may affect, but are not likely to adversely affect the Antillean manatee. The Corps determination is based on the nature and scope of the project, and the full implementation of proposed conservation measures during construction activities. We concur with the Corps determination that the shoreline protections measures proposed in the TSP are not likely to adversely affect the manatee.

In view of this, we believe that requirements of section 7 of the Endangered Species Act (Act) have been satisfied for the Antillean manatee. However, obligations under section 7 of the Act must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner that was not previously considered; (2) this action is subsequently modified in a manner not previously considered in this assessment; or, (3) a new species is listed or critical habitat determined that may be affected by the identified action.

With regards to nesting sea turtles, there is the possibility of nest relocation as a strategy to minimize impacts to nesting sea turtles. As such, the Corps has determined the TSP may affect green, hawksbill, and leatherback sea turtles due to potential need to relocate nests during construction and is requesting formal consultation. The information provided in the BA and the IFR/EA is sufficient to initiate formal consultation or is otherwise accessible for our consideration and reference.

We will initiate formal consultation and issue a Biological Opinion within 90 days of the date of this letter. As a reminder, the Endangered Species Act requires that after initiation of formal consultation, the Federal action agency may not make any irreversible or irretrievable commitment of resources that limits future options.

Thank you for the opportunity to comment on his action, if you have any questions please contact Felix Lopez of my staff at (787) 510-5208.

Sincerely yours,

Edwin E. Muñiz
Field Supervisor

fhl

cc:

DNER, San Juan

PRPB, CZM, San Juan

EPA, San Juan



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

F/SER:JAR/pw/jam

(Sent via Electronic Mail)

Colonel Andrew Kelly, Commander
USACE Jacksonville District
701 San Marco Boulevard
Jacksonville, FL 32232-0019

Attention: Paul M. DeMarco

Dear Colonel Kelly:

NOAA's National Marine Fisheries Service (NMFS) reviewed the letter dated December 4, 2020, from the Jacksonville District initiating consultation under the essential fish habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) and the letter dated December 7, 2020, requesting consultation under Section 7 of the Endangered Species Act (ESA) for the Puerto Rico Coastal Study Draft Integrated Feasibility Report and Environmental Assessment (Study) in the municipalities of San Juan, Carolina, and Rincon¹. The Tentatively Selected Plan (TSP) proposes various elements along specific areas of the Puerto Rico coastline (Condado Pocket Beach, Ocean Park Pocket Beach, Punta Piedrita Headlead, Punta Las Marias Headland, and Rincon) to reduce damages to properties and infrastructure from erosion, wave attack, and flooding caused by coastal storms and hurricanes. Section 2.2.5, Section 5.1.5, and Appendix G Attachment 3 of the Study briefly discuss EFH affected by the TSP. The Jacksonville District's initial determination in Section 6.6.13, based on conceptual designs and preliminary estimates of impacts, is the TSP would not significantly affect EFH or federally managed fisheries in Puerto Rico. The ESA Biological Assessment (BA) summarizes the Jacksonville District's analysis of effects to ESA-listed species and designated critical habitats. The Jacksonville District determined that the proposed action would have no effect to scalloped hammerhead shark, Nassau grouper, and giant manta ray, and may affect, but is not likely to adversely affect, loggerhead, leatherback, green and hawksbill sea turtles, elkhorn, staghorn, pillar, rough cactus, lobed star, mountainous star, and boulder star corals, and may affect but is not likely to adversely modify Acroporid coral designated critical habitat. The NMFS provides the following comments and recommendations pursuant to authorities of the Fish and Wildlife Coordination Act, Magnuson-Stevens Act, and ESA.

The Study evaluates reducing damages to infrastructure due to coastal flooding from storm surge and waves caused by coastal storms and hurricanes. The Study considered structural measures, including revetments, seawalls, beach nourishment, and breakwaters. Nonstructural measures considered included establishment of a coastal construction control line, relocation of structures, and condemnation of structures with subsequent land acquisition. The TSP consists of combinations of structural features to reduce flooding and wave action within four reaches of the

¹ By letter dated December 20, 2018, the NMFS agreed to serve under the National Environmental Policy Act as a cooperating agency for the Study.



San Juan Study Area and one reach within the Rincon Study Area. The Study notes the combinations as well as the features themselves may change during the project's pre-construction engineering and design phase (PED) partly because modeling studies of project effects are not complete. Consequently, the TSP does not quantify total benefits and does not identify the National Economic Development (NED) plan. Currently, the TSP proposes:

- Beach nourishment (1,910 feet) along Condado Pocket Beach shoreline using sand from an upland source;
- Stone revetment on Punta Piedrita headland (2,450 feet);
- A breakwater field in combination with beach nourishment protecting 6,810 feet along the Ocean Park Pocket Beach shoreline using sand from an upland source;
- Stone revetment on the western side of Punta Las Marias headland (1,400 feet); and
- Stone revetment along the Rincon shoreline (5,650 feet).

Impacts from the work to EFH are still to be determined. The Study's EFH section does not include recent, site-specific surveys for hardbottom, coral, coral reef, seagrass, and mangrove habitats. The references to past studies are either incomplete (i.e., cited studies are missing from the Study's references section) or unclear because bibliographic software has replaced the in-text citations with error messages. From our experience, Study data are from the NOAA project "Benthic Habitat Mapping in Puerto Rico and the U.S. Virgin Islands for a Baseline Inventory," conducted during 2000 to 2002, making the data twenty years old. When discussing EFH impacts, the Study Appendix G notes acreages and characterization provided are incomplete and will be updated during PED when project elements are closer to their final design and site-specific surveys are available. Noting those caveats, the Study estimates 14.75 acres of impact to coral and hardbottom habitat. Study Appendix G notes the District will develop during PED the mitigation proposed for the unavoidable impacts to coral, hardbottom, and other habitats.

Effects to ESA-listed species and designated critical habitat within the action area are still to be determined. The BA does not provide sufficient detail to evaluate impacts to ESA-listed corals and designated critical habitat for elkhorn and staghorn corals due to the lack of recent, site-specific surveys for coral, and corals reef and hardbottom habitats. Further, information on the presence, usage, and potential adverse effects on ESA-listed sea turtles is also lacking, given the known adverse effects of breakwaters on swimming adult females attempting to access nesting beaches and swimming hatchlings attempting to access deep water. The BA states that the TSP could potentially directly impact approximately 14.8 acres of hardbottom habitat, and that these are preliminary estimates that are expected to change once updated field surveys can be conducted. Further, the BA neither references nor evaluates impacts of the proposed mitigation plan, which would need to be evaluated as part of the proposed action.

In conclusion, NMFS does not believe the Study has adequate information to describe fully the proposed action or the potential impacts to ESA-listed species, designated critical habitat, or EFH. The Study indicates the additional information we require will not be available until PED. The additional time and funding commonly available during PED will allow the Jacksonville District to conduct more extensive and updated surveys within the action area to inform the development of a Biological Opinion and complete EFH consultation. To diminish the risk of needing to reinitiate consultation, NMFS recommends the Jacksonville District withdraw its current requests for ESA and EFH consultations at this time and pursue consultation during PED.

The NMFS further suggests the Jacksonville District convene a multi-agency workgroup to assist with developing the various data gathering plans necessary to support a successful project. In the meantime, the NMFS intends to provide within a few weeks a technical assistance letter advising on the information necessary to complete the EFH and ESA consultations.

The NMFS appreciates the opportunity to provide these comments. Please direct related EFH correspondence to the attention of Mr. José A. Rivera at Jose.A.Rivera@noaa.gov. Please direct related ESA correspondence to the attention of Helena Antoun at Helena.Antoun@noaa.gov.

Sincerely,

Andrew J. Strelcheck
Acting Regional Administrator

cc: CESAJ, DeMarco, Dunn
FWS, Lopez, Rivera
F/SER3, Bernhart, Antoun, Schull
F/SER4, Fay, Wilber, Rivera



GOVERNMENT OF PUERTO RICO

Department of Natural and Environmental Resources

February 8, 2021

U.S. Army Corps of Engineers
ATTN: Angela Dunn
701 San Marco Blvd.
Jacksonville, Florida 32207-8175
Via email: PuertoRicoCoastalStudy@usace.army.mil

Re: Alternative Solutions for the Puerto Rico Coastal Study

Dear Ms. Dunn:

The Puerto Rico Department of Natural and Environmental Resources (DNER) greatly appreciates the work that the U.S. Army Corps of Engineers (USACE) has undertaken in preparing the *Puerto Rico Coastal Study, Draft Integrated Feasibility Report and Environmental Assessment* (Study). The Study, and the coastal protection and preservation measures that DNER hopes the Study will facilitate, are of great importance to the safety, well-being, and quality of life of the people of Puerto Rico, as well as to the Puerto Rican economy that relies heavily upon our coastal resources [areas] as economic engines.

The DNER supports the goal of reducing coastal storm risk and, as the Study's non-Federal partner, looks forward to working cooperatively with the USACE to identify solutions that will protect Puerto Rico's coastline and infrastructure in a manner that: preserves the recreational and economic opportunities provided by our beaches; limits environmental impacts, enhances ecological functions; and meets local regulations and requirements that generally prohibit obstructing beach use and access.

As you are aware of, DNER has raised concerns that the Tentatively Selected Plan (TSP) identified in the Study, and particularly, the revetments proposed to cover existing permanent and seasonal sandy beach areas, are not consistent with the Puerto Rico law and policy governing public access to beaches and proper uses of the maritime terrestrial zone. In Puerto Rico, public beach access is of the highest importance, with this policy serving as foundation for the Puerto Rico Coastal Zone Management Program (PRCZMP) and local regulations, including Law 151 and Regulation 4860, among others. In addition to concerns regarding revetment, and without the benefit of the USACE data and analyses supporting the TSP, the DNER has some questions and potential concerns regarding the effectiveness and potential impacts of other aspects of the TSP. Accordingly, DNER requests a meeting with the USACE to review this information and the USACE's underlying analyses, and discuss the issues and proposals presented below.



In response to DNER's January 6th 2021 comments, the USACE requested that DNER provide the USACE with potential alternatives to the TSP within 30 days. To accommodate this request, DNER has identified the potential alternatives below as initial solutions for discussion and further consideration. While DNER was not able to fully evaluate the feasibility, effectiveness, cost, and environmental impacts of these solutions within that limited timeframe, DNER believes that these alternatives warrant further review. DNER has also highlighted questions and concerns below with respect to the TSP, which we would like to discuss further with the USACE.

San Juan Area

- Punta Piedrita and Punta Las Marías Headlands. To comply with Puerto Rico law and policy, DNER seeks a solution that would eliminate all revetment over existing permanent or seasonal sandy beach areas in the Punta Piedrita and Punta Las Marías headlands. To achieve this, DNER proposes modifying the number and the layout of the breakwaters and nourishment proposed in the TSP on either end of the Ocean Park Pocket Beach to eliminate the need for revetments in the headlands' sandy beach areas.
- Ocean Park Pocket Beach. To protect the Ocean Park Pocket Beach, the TSP includes submerged detached breakwaters. DNER is not necessarily opposed to this proposed solution, but requests that the USACE provides its analysis supporting the use of submerged detached breakwaters in order to better assess two potential concerns:
 - First, DNER is concerned that submerged detached breakwaters would not themselves provide shore protection given that they are substantially below the level of wave action, especially those waves that would be superimposed on any elevated surge associated with storms. Presumably, the intent is for the breakwaters to work in combination with the proposed beach fill to provide the necessary upland protection, although this is one of the clarifications we would like to discuss further with the USACE in our requested dialogue.
 - Second, recognizing the secondary Study purpose of preserving recreational opportunities, DNER seeks confirmation that the solution at the Ocean Park Pocket Beach will allow for the continued use of this area for water-based recreational activities prevalent in this sector, such as surfing, paddle-boarding, kite-boarding, and windsurfing. If breakwaters in the area of Ocean Park (including the above-proposed east and west extensions to provide protection in lieu of revetment) would prohibit current water-based recreational activities, DNER would request the





opportunity to work with the USACE to explore feasible and cost effective modifications of, or alternatives to the TSP for this area. These modifications or alternatives could promote and continue the current range of uses and economic activity across the sector, including allowing for recreation and environmental education uses.

- Condado Pocket Beach: The Condado Pocket Beach is currently among the most dangerous beaches in Puerto Rico for swimmers due to significant rip tides and its high number of users (including tourists staying in the area's beach-front hotels). The TSP proposes approximately 1,910 feet of beach nourishment along the Condado Pocket Beach. The DNER notes that a high proportion of tourists utilize this beach, making it an important economic resource, and differentiating this area from the other planning sectors. The DNER would like to work with the USACE to further examine whether structural solutions combined with the proposed beach nourishment would sufficiently reduce wave and current action thus, providing necessary protections, while reducing risks and saving lives at this beach and enhancing the local economy.

Rincón

Like the Punta Piedrita and Punta Las Marías headlands, DNER seeks a solution in the Rincón area that would eliminate all revetment over existing permanent or seasonal sandy beach areas, consistent with the requirements of Puerto Rico law and policy. In place of revetment, DNER proposes a solution based on the principle of "extended pocket beaches," where the existing permanent or seasonal sandy beaches within the roughly one-mile segment proposed for revetment would be protected and enhanced utilizing non-revetment structural measures, which could include detached breakwaters, groins, or other appropriate structures, all in combination with fill.

In addition, while the DNER recognizes the present Study is examining the feasibility, we wish to inform the USACE that in the Rincón sector, there are a number of structures that were built coastward of what is allowable under Puerto Rico land use requirements, many of which are currently abandoned and may be owned by financial institutions. Potential local incentives, such as tax credits to encourage the placement of those properties into conservation easements, could reduce the damage potential and open additional alternatives as discussed above.

In the areas of Córcega beaches that still remain in this area, hawksbill and shearing nests have been sporadically documented. This implies that an adequate ecological restoration of the beaches could benefit these species, since the habitat would be recovered and therefore, the numbers of nests of these species could increase.

U.S. Army Corps of Engineers
ATTN: Angela Dunn
Page 4
February 8, 2021

The DNER appreciates the opportunity to continue to work cooperatively with the USACE on the important task of improving coastal storm risk management within the framework of existing Puerto Rico laws and policies.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rafael Machargo". The signature is fluid and cursive, with the first name "Rafael" being more prominent than the last name "Machargo".

Rafael Machargo-Maldonado
Secretary



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

F/SER31

(Sent via Electronic Mail)

Colonel Andrew Kelly, Commander
USACE Jacksonville District
701 San Marco Boulevard
Jacksonville, FL 32232-0019

Attention: Paul M. DeMarco

Dear Colonel Kelly:

By letter dated January 27, 2021, NOAA's National Marine Fisheries Service (NMFS) indicated it was unable to complete consultation with the U.S. Army Corps of Engineers Jacksonville District (USACE) under the essential fish habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act and Section 7 of the Endangered Species Act (ESA) for the *Puerto Rico Coastal Study Draft Integrated Feasibility Report and Environmental Assessment* (Study) in the municipalities of San Juan, Carolina, and Rincon. The NMFS based this conclusion on the Study's EFH section not including recent, site-specific surveys for hardbottom, coral, coral reef, seagrass, and mangrove habitats making the impacts to EFH from the proposed project unclear. Similarly, the Biological Assessment does not provide sufficient detail for evaluating effects to ESA-listed corals and designated critical habitat due to the lack of recent, site-specific surveys. For both consultations, the Study lacked detailed descriptions of the proposed action and discussion of the interactions with the physical environment (e.g., local hydrography, sediments, and sediment transport). The referenced letter explains these determinations further. The NMFS provides the following comments to assist the USACE with preparing the information necessary to complete the EFH and ESA consultations for the Study.

The Study describes the Tentatively Selected Plan (TSP) as beach nourishment (1,910 feet) along Condado Pocket Beach shoreline using sand from an upland source; a stone revetment on Punta Piedrita headland (2,450 feet); a breakwater field in combination with beach nourishment protecting 6,810 feet along the Ocean Park Pocket Beach shoreline using sand from an upland source; a stone revetment on the western side of Punta Las Marias headland (1,400 feet); and a stone revetment (5,650 feet) along the Rincon shoreline. However, during a meeting with the USACE on February 11, 2021, the USACE indicated these general plans might change by substituting revetments for beach nourishment at one or more locations and altering locations of breakwaters to accommodate existing submarine fiber optic cables.

To complete the EFH and ESA consultations for the Study:

1. The NMFS requires a more detailed description of the proposed action, including:



- A description of all beach nourishments, revetments, and breakwaters the USACE wants NMFS to include in the EFH and ESA consultations. These descriptions should include:
 - Footprints of each project component as constructed and after any post-construction equilibration to local conditions.
 - Overlaps of each footprint with EFH, ESA-listed species, and designated critical habitat. For project components with substantial overlaps with EFH, ESA-listed species, and/or critical habitat, component descriptions should justify the need for the component with respect to the overall project purpose.
 - Evaluations of the compatibility of sands proposed for nourishing beaches with the target beaches from the perspectives of beach profiles, beach stability, sediment transport, and suitability for nesting sea turtles.
 - Application of hydrodynamic models to examine Study sites to ensure the models are well-suited for the Study areas both pre- and post-construction, especially if the TSP includes breakwater fields. The NMFS recommends collaboration with local experts from the Puerto Rico Department of Environmental Resources and universities to conduct these evaluations.
 - Descriptions of the methods the USACE will use to construct the proposed beach nourishments, revetments, and breakwaters. These descriptions should include staging areas for equipment and materials and the overlaps of staging areas with EFH, ESA-listed species, and/or critical habitat if not included the component footprints requested above.
 - Descriptions of the measures the USACE will undertake to avoid and minimize impacts to EFH, ESA-listed species, and their critical habitat from the project and its construction. These minimization measures may include environmental windows to minimize overlaps with sea turtle nesting and coral spawning and settlement periods, relocation of non-diseased corals to suitable recipient sites (NMFS recommends the USACE use criteria developed by the Florida Fish and Wildlife Conservation Commission for determining suitability), best management practices to control sedimentation and erosion, and transplantation of seagrass.
 - A consideration of incorporating natural and nature-based features into the project design to limit unnecessary armoring and hardening of shorelines. Natural and nature-based features may increase coastal storm resilience, reduce long-term maintenance costs, and provide satisfactory cost-benefit analyses. Opportunities may include adding coral reef features to proposed breakwaters and enhancing natural coral reef features.
2. The NMFS requires an analysis of the effects, including cumulative effects, of the action on EFH, ESA-listed species, and designated critical habitat including:
- An Impact Assessment with:
 - An analysis of the direct effects to ESA-listed species and designated critical habitat, seagrass, mangroves, corals, sponges, and hardbottom. The analysis should be based on surveys completed within one to two years prior to consultation and include estimates of numbers of individuals or acreages to be impacted by the project. The surveys should focus on the communities mentioned above, include verification through direct observations, and use established protocols. The surveys should include all areas of direct and indirect impact. The seagrass survey should be conducted during the time of year most suited to detecting the spatial extent of seagrass (i.e., usually done by balancing water clarity and above-ground seagrass biomass). The survey methods should include collection of quantitative cover-

abundance data from an adequate number of one-square-meter quadrats for individual beds or transect lines and one-square meter quadrats for continuous beds. The coral reef survey should characterize the biotic and abiotic (i.e., presence and depth of sediment) components of the habitats. A survey to quantify and characterize the presence of ESA-listed corals should also be conducted in accordance with survey protocol found at <https://www.fisheries.noaa.gov/webdam/download/93540778>. The NMFS recommends the USACE coordinate closely with us during development of the survey methods for coral reef habitats needed for both the EFH and ESA consultations.

- An analysis of indirect effects based on the best available information on ocean circulation patterns and local hydrodynamics. The analysis of the severity and extent of indirect effects from sedimentation and turbidity should include a discussion of the scientific rationale and/or modeling.
- An analysis of potential impacts of proposed breakwaters on swimming sea turtles. Breakwaters, especially emergent breakwaters, may block or trap sea turtles from accessing foraging or nesting areas, and may trap hatchlings making them more vulnerable to predation.
- An analysis of effects that describes any impacts the project may have on the prevalence of Stony Coral Tissue Loss Disease (SCTLD).
- An analysis of temporary degradation of water quality through increased turbidity and stress to corals from reduced light in the water column, sediment abrasion, and sediment deposition.
- An analysis of cumulative effects to coral reef, mangrove, and seagrass habitats. This analysis should include maintenance of project components after their initial construction.
- An Adaptive Management Plan and a Monitoring Plan to verify the project effects are within the ranges predicted. The plans should include appropriate reference sites, collection of water quality data from the surface and near the bottom, and frequent diver surveys to assess rapidly sedimentation impacts in coral reef and seagrass habitats. The plan should contain clearly identified corrective actions the USACE will implement in the case monitoring reveals irreversible impacts to seagrass and coral reef habitats.

4. The NMFS requires the USACE develop a detailed plan to offset unavoidable impacts from the project, including:

- A mitigation plan describing mangrove, seagrass, and coral reef/hardbottom mitigation activities sited at locations outside the influence of the project or other coastal construction activities. The mitigation amounts should fully offset the direct and indirect impacts resulting from the project and based on a Functional Assessment using a Habitat Equivalency Analysis or Resource Equivalency Analysis that reflects NMFS input. The plan should clearly identify performance criteria for each mitigation activity and describe biological monitoring to gauge the success of the mitigation performance criteria. The coral component of the mitigation plan should reflect best practices of coral restoration, in addition to best practices for SCTLD response and intervention (the NMFS maintains a current list of these practices and can share with the USACE during development of the EFH Assessment and Biological Assessment). The mitigation plan should consider novel ecological and assisted reproductive strategies, in an effort to ensure mitigation activities

represent the best opportunities to recover the structure and function of coral reef habitat and corals.

- Elements warranting inclusion in the coral mitigation plan may include collection/caching of species susceptible to SCTLD (including larval collection from species with low natural sexual reproduction success for land-based rearing and later outplanting to the reef), outplanting corals on reef sites based on novel coral outplanting strategies (including the creation of spawning hubs to facilitate reproduction success), and outplanting coral micro-fragments in a manner to maximize fusion and growth rates. Recipient sites for coral outplants should be selected based on best available information including results of modeling efforts that indicate locations where currents facilitate the dispersal of larvae to a greater number of surrounding reefs thereby promoting connectivity of coral populations.
- A compensatory seagrass mitigation plan to offset fully any unavoidable loss of seagrass resources within the project area.

The NMFS appreciates the opportunity to provide these comments and commits to working with the USACE to develop appropriate monitoring and mitigation plans for the project. The NMFS also recommends the USACE establish working groups to ensure plans maximize use of site-specific knowledge. In particular, the NMFS recommends the USACE coordinate finalization of the Study with similar efforts led and/or funded by the Federal Emergency Management Agency (e.g., the Metro San Juan Hazard Mitigation Project). Please direct related EFH correspondence to the attention of Mr. José A. Rivera at Jose.A.Rivera@noaa.gov. Please direct related ESA correspondence to the attention of Helena Antoun at Helena.Antoun@noaa.gov.

Sincerely,

David Bernhart
Assistant Regional Administrator
Protected Resources Division

cc: CESAJ, Paul.M.DeMarco@usace.army.mil, Gretchen.S.Ehlinger@usace.army.mil
FWS, Felix_Lopez@fws.gov, Marelisa_Rivera@fws.gov
F/SER3, Helena.Antoun@noaa.gov, Jennifer.Schull@noaa.gov
F/SER4, Jose.A.Rivera@noaa.gov, Pace.Wilber@noaa.gov



GOBIERNO DE PUERTO RICO

JUNTA DE PLANIFICACIÓN DE PUERTO RICO

15 DE MARZO DE 2021

SUPERVISOR
US FISH & WILDLIFE SERVICE
CARIBBEAN FIELD OFFICE
PO BOX 491
BOQUERON PR 00622-0491

CASO NÚMERO: CZ-2021-1209-041

Estimado(a) señor(a):

Cumpliendo con las disposiciones de la Ley Núm. 75 del 24 de junio de 1975, y Ley Núm. 38 de 30 de junio de 2017, según enmendadas y para su notificación oficial, incluimos copia certificada del acuerdo adoptado por la Junta de Planificación de Puerto Rico en relación con el asunto de referencia.

Cordialmente,

Loida Soto Noguera
Secretaria
Junta Propia

Anejo



GOVERNMENT OF PUERTO RICO
PUERTO RICO PLANNING BOARD
SAN JUAN, PUERTO RICO

March 3, 2021

Federal Consistency Determination
Puerto Rico Coastal Zone Management Program (PRCZMP) o
CZ-2021-1209-041 o
Puerto Rico Coastal Study
Draft Integrated Feasibility Report and Environmental Assessment
San Juan and Rincón

RESOLUTION

**TO NOTIFY PARTIES ABOUT THE PUERTO RICO PLANNING BOARD o
DETERMINATION ABOUT FEDERAL CONSISTENCY WITH THE PUERTO RICO
COASTAL ZONE MANAGEMENT PROGRAM ACCORDING TO COASTAL ZONE
MANAGEMENT ACT REGULATIONS AT 15 CFR PART 930 o o**

The U.S. Army Corps of Engineers (USACE) submitted a Determination of Federal Consistency o with the Puerto Rico Coastal Zone Management Program (PRCZMP) on December 7, 2020, as part of the Feasibility Study phase for the PR Coastal Study at reference. As part of the Disaster Declaration issued by the United States President after the passage of Hurricanes Irma and Maria, the United States congress assigned a minimum allocation of \$ 75,000,000 to the USACE to carry out studies aimed at reducing the damage caused by these storms in the impacted states and island areas of the nation. In response to this request, The USACE in collaboration with the Department of Natural and Environmental Resources (DNER) as sponsor has carried out a Feasibility Study to determine if there is the economic justification and Federal interest to develop a plan with alternatives to reduce damage to property and infrastructure in certain coastal areas of Puerto Rico. On November 2020, the USACE published the "PR Coastal Study, Draft Integrated Feasibility Report and Environmental Assessment" document proposing a Tentatively Selected Plan to achieve the following objectives:

- Primary Objective: Manage the risk of damages from wave attack, flooding, and erosion caused by coastal storms to property and infrastructure within the project area over a 50-year period of analysis (2028 – 2077).
- Secondary Objectives:
 - Maintain recreational use of beach and nearshore areas over a 50-year period of analysis (2028 – 2077).
 - Maintain environmental quality in the project area over a 50-year period of analysis (2028 – 2077).

Initially, the study area included the coasts of San Juan, Carolina, Vega Baja, Arecibo, Aguadilla, Aguada, Rincón, Añasco, Mayagüez, Cabo Rojo, Loíza, Luquillo, and Humacao. After conducting the preliminary evaluations, the USACE determined that the areas, which meet the necessary criteria to develop a plan with project alternatives, are the following:

Municipality	Coastal Sector	Limits
San Juan	Condado Pocket Beach	From Ventana Al Mar park to Cervantes street.
	Punta Piedrita Headland	Beach area from Cervantes Street to "Parque del Indio".



	Ocean Park Pocket Beach	From Parque del Indio to the east side of the recreative area of Park Boulevard Residential Building.
	Punta Las Marias Headland	From Park Boulevard building to Punta Las Marias.
Rincón	Rincon B	From the river mouth of Quebrada Los Ramos in Corcega Beach to Sunfish Beachfront Building.

The Feasibility Study evaluate different alternatives in terms of the way in which each one meets the established primary and secondary objectives. The evaluation was carried out by comparing the scenario of damages expected in the Future without Project (FWOP) with the economic costs and benefits that the projects or alternatives will have. After completing it, the USACE established the following alternatives as a Tentatively Selected Plan (TSP):

Area	Alternative and Description	Estimated Project Cost in Present Value
Condado Pocket Beach	Alt-3c. "Beach Nourishment": includes initial construction of a beach fill of 110,000 cubic yards with a 50' berm and two future re-nourishments of 51,000 cubic yards each.	26,967,000
Punta Piedrita Headland	Alt-2. Revetment: A stone revetment of 14 ft-PRVD02 crest elevation on the western side, contiguous to a revetment of 11 ft-PRVD02 crest elevation on the eastern side. This will protect the entire headland, reducing erosion, flood and wave risk.	\$21,334,000
Ocean Park Pocket Beach	Alt-5a. "Beach Nourishment" + Breakwaters: A set of 8 breakwaters to reduce wave energy; combined with beach nourishment of 350,000 cubic yards, a 50' berm and one future re-nourishment of 161,000 cubic yards.	\$109,081,603
Punta Las Marias Headland	Alt-2 Revetment: A stone revetment of 11 ft-PRVD02 crest elevation on the western side of this headland will be considered to reduce erosion, flooding and wave risk.	\$13,100,612
Rincon B	Alt-2 Revetment: A stone revetment of 11 ft-PRVD02 crest elevation on the entire reach will be considered to reduce erosion, flooding and wave risk.	\$27,900,109

As part of the Federal Consistency review process, the Puerto Rico Planning Board requested comments from the DNER, the Puerto Rican Culture Institute (PRCI), and the State Historic Preservation Office. A public notice was disclosed among municipalities, agencies, non-governmental organizations and residents within the designated areas. A Summary of the received comments follows:

- **Department of Natural and Environmental Resources (DNER):** The Puerto Rico Department of Natural and Environmental Resources (DNER) is the lead agency for



implementing the PRCZMP, and oversees Regulation 4860, which is and enforceable policy of the PRCZMP. In addition, DNER will be responsible for providing local funding and maintaining any infrastructure for the project that is approved pursuant to the Study, as the Study's Non-Federal Sponsor. DNER has significant concerns that the TSP's proposal to place revetment on permanent and seasonal sandy beaches is not consistent with the PRCZMP and would not be appropriate for DNER to authorize or fund. DNER has raised these concerns in a letter to the USACE on January 6, 2021 and is currently discussing with the USACE on a path forward, including identifying and evaluating one or more additional alternatives.

DNER supports the primary and secondary purposes of the Study, which includes developing a project that protects Puerto Rico's shorelines, while preserving recreational opportunities and environmental resources. At the same time, DNER must abide by the Commonwealth laws, regulations, directives, and policies that prohibit (or severely limit) blocking access to and placing obstructions in the Puerto Rico's maritime-terrestrial zone. For example, as noted in DNER's letter to the USACE, the DNER Secretary's 2018 directive to the Permits Area (Azure's case) prohibits the use of boulders, rocks, and revetments of any kind that may affect sandy beaches and beach dynamics, particularly on highly visited touristic-recreational and/or sea turtle nesting beaches.

Placing revetment on sandy beaches in Rincon and the Punta Piedrita and Punta Las Marias headlands, in San Juan, is not consistent with the Commonwealth law, regulations, and policies, including the PRCZMP and the DNER Secretary's directive. Therefore, we are recommending considering other options instead to the proposed preferred alternative by the USACE in the Study's Chapter 3 (Plan formulation, regarding revetments). Of note, the PRPB has previously denied the certification for a revetment in one of the same areas where the TSP now proposes a revetment (on a seasonal sandy beach at the Punta Las Marias headland). This, on the grounds that it was an impermissible use of the maritime-terrestrial zone, in violation of Regulation 4860, and inconsistent with the PRCZMP. The PRPB cannot properly issue a Federal Consistency Certification under the Coastal Zone Management Act (CZMA) for any proposed solution that eliminates the public use of beaches for recreation and for access to other nearby beaches by covering such beaches with revetment.

DNER also believes that it is premature for the PRPB to make a Federal Consistency Determination. Currently, the USACE has only issued a DRAFT Feasibility Study that has not yet been informed by public and agency review, and where the Application specifically states that a final design may include a different combination of revetment, breakwaters, and nourishment than identified in the TSP. Without a final (or more advanced) project design, the PRPB cannot properly determine Consistency with the PRCZMP.

Also, as indicated in DNER's January 6, 2021 letter, further analyses are needed to confirm the feasibility and impacts of the TSP and determine whether the alternatives that meet the study's primary and secondary purposes i.e., storm protection and preserving sandy beaches for recreation, respectively. In addition, at the USACE's request, DNER is currently identifying and evaluating an alternative to the TSP that DNER will share and coordinate with USACE for review and consideration.

- **San Juan Bay Estuary Program (SBEP):** this non-profit corporation expressed the following concerns and recommendations:

Concerns

- The San Juan Bay Estuary Program (SBEP) recognizes the importance of mitigating the impact of storms and hurricanes on our coastal communities and welcomes the efforts of the PR Planning Board and the USACE on this. However, we understand that any effective and successful solution must be part of an integrated water resource and ecosystem



management strategy based on a comprehensive analysis of existing studies, plans and projects that influence the success of the TSP in protecting our communities.

- First, USACE continues to work part of the analysis of the models and information, therefore, a variety of details that affect the selection of effective solutions are unknown. For example, for the restoration of Condado and Ocean Park beaches, the number of periodic sand-feeding events required to ensure the longevity of the intervention, as well as the cost of maintenance, is unknown. The TSP also does not present conclusive results on the benefits of the project in reducing damages of storms and hurricanes. In the absence of these key pieces of information, it is difficult to determine whether the Condado and Ocean Park beach proposals are economically justified.

- The completed analyzes in turn do not recognize the interdependence between ecosystems and communities. The corals, mangroves, wetlands, and forests of the estuary system's watershed work together to provide a natural barrier against storms, prevent and avoid flooding, stabilize the terrain, minimize landslides and erosion, and retain sediments to preserve water quality. In addition, the variety of ecosystems in the basin make it an important focus of tropical biodiversity.

- The ecosystem services provided by the San Juan Bay Estuary generate millions of dollars for the local economy. Over 1,000 fishermen depend on the estuary ecosystem, catching an average of 350,000 pounds of fish per year. The Port of San Juan, located in the Bay of San Juan, receives approximately 80% of the products imported to Puerto Rico each year. It also receives an average of 700 cruises a year, which translates to about 1.3 million tourists.

- The breakwater structures proposed for the Ocean Park beach could also affect and prevent the nesting of the leatherback sea turtle (*Dermochelys coriacea*). The sandy beaches of San Juan have been recognized as an important habitat for this threatened and federally protected species. In 2020, 17 leatherback nests were recorded only in San Juan. Although the TSP establishes how to minimize impacts to wildlife during the construction phase (eg, do not build during the nesting season, stop construction if sighted less than 100 yards, etc.), it does not define how it will address impacts in the long term.

- A project with the mission of managing the impact of storms and hurricanes on coastal communities must consider natural infrastructure if it is to be cost-effective and successful in the long term. Therefore, we find the projected impacts of this project counterproductive especially in terms of coral reefs and existing coastal vegetation.

- Although the TSP mentions that the breakwaters to be installed on the Ocean Park beach could cause erosion on the adjacent coasts and put other adjacent communities at risk, it does not contemplate studies, existing plans and projects to manage the impact of storms and hurricanes on the coast of San Juan and surrounding municipalities. The TSP didn't also make reference to the Caño Martín Peña Ecosystem Restoration Project.

- The limited scope of analyzes and solutions proposed in the TSP presents major environmental justice concerns. First, the TSP determines the cost-effectiveness of a solution based on the value of the impacted properties. This criterion puts the benefit of a socioeconomic group before the ecosystem services that would be eliminated with the implementation of the TSP.

- The EJ Screen Tool, the EPA tool used by USACE in its analysis, has limitations in terms of its specificity and relevance to the island context. Definitions used at the federal level for "minority" and "low-income communities" do not capture local diversity. For example, at the federal level, Hispanic ethnicity is considered a minority, yet 98.2% of the



population of Puerto Rico identifies as such. USACE confirms this limitation in Appendix G of the TSP.

Recommendations of the SJBEP:

- Understand that to evaluate the real impact of the project and therefore its prudence and viability, the PRPB and the Government of Puerto Rico must carry out a complete analysis of the existing information before the issuance of permits, as well as analyze public policies that could conflict. For example, the Law No. 72 of 202 was approved recently to declare coral reefs as an essential structure for protection of the coasts. By being declared essential structures, it seeks to increase their protection and conservation, as well as to facilitate the processing of funds for these purposes. On the other hand, the Law for the Protection, Conservation and Management of Coral Reefs in Puerto Rico (Law 147 of 1999) establishes that *"the public interest urges to avoid and prevent continuous and irreparable damage to coral reefs and to marine life associated with it"*.
- The USACE must broaden its analysis to include existing studies, plans and projects that may influence in their proposal to manage the impact of storms and hurricanes in our coastal zone. In this way, the scope of intervention and necessary contribution by USACE is refined, eliminating redundancies and conflicts and maximizing resources.
- The SJBEP invite both PRPB and USACE to consider trends demonstrated elsewhere in adapting to climate change, mitigating risks, and exacerbating social inequality in the process. The SJBE recommend using alternative property value criteria in the process of selecting communities to serve, such as, but not limited to: number of people, households or families to be protected with the adaptation measures evaluated; access to resources for adaptation to climate change and preparedness for natural disasters (eg. economic capacity to purchase materials to protect homes); lack of resources to be able to evacuate areas at risk; proportion of aging members present in the community; risk of loss of homes; government costs to attend to health, physical and property damages in communities as a result of a disaster.
- In terms of the solutions proposed in the TSP, the SJBEP recommend that USACE use its Engineering with Nature strategy and include nature-based alternatives that strengthen the capacity of our ecosystems to provide their multiple ecosystem services to reduce risks to our coastal zone due to storms and hurricanes and thus protect property and infrastructure. Specifically, TSP should focus on supporting:
 - Restoration and strengthening of coral reefs.
 - Restoration and strengthening of existing dunes.
 - Mangrove reforestation.
 - Restoration of seagrass meadows.

The SBEP also include the following specific comments and recommendations:

1. Both the Certification Application and the TSP mention the amount in acres of coral reef and colonized bottom to potentially be impacted. However, this does not put into perspective the total coral reef and colonized bottom on the San Juan coast (eg, percent of reef to be impacted). Without this information, the scientific basis lacks accuracy on the scale of the impacts of these proposed projects. We consider this an information deficiency.
2. Since the nourishment of sandy beaches is proposed, the TSP must include a plan to manage sediment during events of strong winds and waves. It is important to have agreements and plans in place with relevant agencies on what to do with sand that naturally travels to adjacent communities and roads.
3. In the notice published as part of the Federal Consistency review, it is mentioned that like reefs, dunes and beaches will be impacted, but there is no detail on how or to what extent.



4. The public notice does not explain or make direct reference to the presented maps and graphs.
5. In section 6.6.23 E.O. 13089, CORAL REEF PROTECTION on pages 6-25 of the TSP states that no effects to coral reefs are expected from construction activities given the distance of the reefs from the project area. This is contradictory to other sections of the TSP where damage to coral reefs is anticipated and the amount is estimated in acres.

- **PR House of Representatives:** Representative Mariana Nogales Molinelli provided the following comments and recommendations focused on the following areas: public participation, criteria for selection and scientific concerns.

Inadequate notification and lack of public participation:

We have identified several conditions that represent obstacles to an adequate and inclusive process of public participation and that, therefore, excluded communities and individuals over which the proposals set forth in this study have serious impact. Those obstacles are related to language, media use for notifications and timing of the publication.

First, the draft report was published exclusively in English language. Likewise, the dedicated webpage, related materials and offered webinars are only in English language. No Spanish translation has been made available, even though the majority of Puerto Ricans, around 80%, do not consider themselves fluently bilingual and many more would consider the highly technical language of the report even more difficult.¹ No measures were taken to make this information accessible to diverse populations such as those with disabilities and those who lack access to the internet.

Second, the USACE has stated that it published the notification for the study and the period for public comments in a local newspaper, sent a press release and bought publicity in social media. It also claimed to have sent letters to neighbors of the areas that would be affected. Yet many interested parties, including community members and scientists, did not gain knowledge of this process until the "Centro de Periodismo Investigativo (CPI)" published an investigative report on the study on December 28, 2021, just over a week before comments were due.² Also, communities that were finally excluded from the USACE's plan do not seem to have been notified.

The circumstances during which the period for comments was open must be taken into consideration to evaluate the effectiveness and adequacy of the media used to notify its opening. These minimal efforts happened in the middle of a pandemic, during which the consumption of printed materials and person to person contact has been very limited, just after a highly contested and controversial election that was monopolizing news coverage and social media timelines, and during the holidays. To make matters more difficult, the pandemic has been an immense obstacle to community organizing drives and events in which neighbors meet, share information and make decisions regarding their needs and worries. The short period of time, the pandemic and the holiday period also make it very complicated to find experts and professionals that are willing and available to counsel communities and individuals on this highly technical topic and accompany them in the development of their comments.

Considering the aforementioned, the USACE should have made a greater effort to share information and promote discussion regarding this study. To clearly illustrate our concern, we found that a web search of the study barely produces a couple of hits of material produced by the CPI and the study's own dedicated webpage. No more news coverage is to be found, either of press releases or public appearances by representatives, nor digital versions of newspaper edicts or social media ads.



The fact that the USACE instructed us to direct our comments to the Puerto Rico Planning Board (PRPB) to be considered for inclusion with the agency's comments is far from enough. To our knowledge, no additional efforts have been made to publicize this report to community members. To our knowledge no additional advertising has been published by the PRPB. Nor a guarantee has been given that these comments will be attached to the PRPB's. Even then, community and scientific voices should be heard directly by the proponent, not through a middleman.

Recommendations: *Reopen the period for comments and take measures to guarantee accessibility. - Launch an ample and inclusive information campaign explaining the plans using diverse media and in-person community meetings that follow public health guidelines. - Translate all information to Spanish, otherwise it is clearly discriminatory.*

Criteria for selection:

It is very distressing that the USACE applied economic criteria almost exclusively when deciding the areas on which to invest its resources. It is obvious from the sections of coast that were finally selected that the USACE's intention is to protect high value private properties in affluent areas, all while excluding historically impoverished and exploited communities. Even if the criteria for selection is not discriminatory in its intent, it is so in its result.

The two coastal sections selected for hazard mitigation investments are developed areas dedicated to intensive tourist activity in small and big hotels, and seasonal and short rentals, and wealthy residential communities, all built in defiance of the warnings made by experts about the rising seas and its risks. Property owners in these areas have ample access to funding, incentives, expertise and insurance to both mitigate the impact of natural disasters and recover from the damages caused by them. Meanwhile, the excluded areas are mostly composed of impoverished or working-class communities with very limited or inexistent access to alternative housing, financing for protective infrastructure and hazard mitigation or insurance policies. This is true of, for example, communities in Loíza and Arecibo.

As a result, the USACE's selection replicates the social and economic disadvantages and biases that have left the excluded communities to their own very limited devices in the face of extreme weather conditions, frequent flooding and abandonment of infrastructure. It would be regrettable to see more public funding given to the already wealthy and privileged instead of using it to give safe and dignified livelihoods to those who are suffering the worst consequences of climate change.

Recommendations: *- Reconsider the selection of coastlines. - Open this selection to public discussion and requests based on necessity - Consider adding social and economic costs of withheld intervention in impoverished, inhabited areas.*

Scientific concerns:

As previously stated, three very well-known scientists have raised their concerns and have warned of the adverse consequences that the proposals in the study may carry. Miguel Canals Silander, director of the Center of Applied Oceanic Sciences and Engineering of the University of Puerto Rico in Mayaguez (RUM), Aurelio Mercado, professor of Oceanography at the RUM, and Maritza Barreto, director of the Institute for the Investigation and Coastal Planification of Puerto Rico, warned that this critical project needs to be publicized, analyzed and commented by the public for a sufficient time frame.



For example, as reported by the CPI, the scientists have warned that replacing the sandy beaches with rocks would affect the possibility of recovering the eroded beaches and would compromise the tourism industry, all to protect houses that will lose value anyway due to the elimination of the beach. The loss of tourism is also a hit to industry workers who will continue to lose employment opportunities and to permanent residents of these areas, who already suffer the consequences of neighboring destroyed properties, and will see the multiplication of nuisances as property owners abandon devalued buildings. Meanwhile, no effective control measures have been taken to limit construction in the coastal areas.

Recommendations:

- *Consider holistic and sensitive alternatives that take into account all areas of the livelihood and culture of impacted communities.*
- *Explore financing options that allow for preferable alternatives that are initially more expensive to be reconsidered.*
- *Open discussion, debate and extend the period for local scientists to state their concerns and provide much better alternatives to your proposal.*

- **PR Tourism Company (PRTC):** The recently created Socio-ecological Analysis Unit of the Sustainable Tourism Division evaluated the document and presented the following recommendations:

- The document justifies the proposed alternatives based on the application of criteria and the study of damages in the future if no action is taken. However, it also establishes that it is a Feasibility Study and lacks details, so a tentative-conceptual and not final design is presented.
- Based on the cost-benefit analysis carried out and presented in the document, it is recommended to consider the useful life of the presented alternatives. For example, in the case of the proposed beach nourishment, it is an expensive and temporary solution that requires re-nourishment with certain established frequency. Therefore, a model on marine currents variable among others should be in order to establish an estimate of the useful life of this alternative. Another factor to consider is the type of sand to be used and if it is compatible with each location. There are practices that help to reduce environmental impacts, so a description of the methodology must be included.
- On the other hand, the document establishes that the seagrass will be indirectly impacted due to turbidity during the construction phase. However, impacts can be reduced by implementing best management practices. Therefore, it is pertinent as established above to include a description of the methodology.
- The document in turn mentions that the proposed alternatives "may affect but is not likely to negatively affect": West Indian manatee, sea turtles (loggerhead or loggerhead, hawksbill, leatherback and green turtle), invertebrates (maple horn coral, horn coral stag, pillar coral, lobed star coral, mountainous star coral, rocky star coral, rough cactus coral). Some of these species are in danger of extinction and others in threat. According to the Feasibility Study, the USACE will be performing a formal consultation to the Fish & Wildlife Service and the National Marine Fisheries Service about impacts on these threatened and Endangered Species. The PRTC will be waiting to know the position of these agencies and the DNER to pronounce a formal endorsement for the proposed alternatives.
- Given that this study has implications in the PR coastal zone, it must have the endorsement from the PR Coastal Zone Management Program Office at DNER.

- The objective of the proposed project alternatives seeks to protect property and infrastructure against risks in various coastal areas of Puerto Rico and recognizes the impact of climate change. It is recommended to consult the Post-Maria Beach Assessment/HMGP FEMA-4339-DR-PR. This study assesses the entire coast of Puerto Rico in terms of bio-physical and social vulnerability, considering appropriate courses of action to mitigate and promote adaptation and resilience, taking into account the impact of climate change.
- **Sea Grant:** The proposed COE plan errs since it only takes into consideration the protection of property and infrastructure, forgetting or neglecting the health of the beach ecosystem and "Other Social Effects" including, access to the beach, and the recreational and economic opportunities provided by the beaches of Rincón. These "Other Social Effects" are very important to the quality of life of residents and visitors of Rincón, and need to be included in the USACE analysis, since beaches are the natural attraction that serve as a base to the economy of Rincón. The Federal response to the erosion, wave attack and flooding from coastal storms and hurricanes along specific areas of the Rincón coastline should be a hybrid project that considers an array of engineering alternatives including submerged reefs and structures, beach nourishment, appropriation and removal or relocation of abandoned structures and revetments in some areas. The same engineering actions can't be applied to the 2.5 miles of beaches from Punta Ensenada to south of Stella community including Córcega.

Actually, there are pocket beaches with good sand to practice marine recreation activities, these will be eliminated if the proposed revetment is applied without consideration to recreational and economic opportunities they provide. A revetment for the 2.5 miles is not an appropriate solution, it is preferred to leave things as they are. What Rincón needs is to protect the natural attractions (beaches) before property and infrastructure.

The proposed revetment of 2.5 miles for the best beaches of Rincón, will result in the elimination of access to the beach and the erosion of all the sand from these beaches that are ideal to practice marine recreational activities unassociated with surfing (walking, running, paddle ball, sunbathing, swimming, snorkeling, standup paddleboards, kayaking, volleyball). Rincón is a municipality that depends on beaches, waves, water quality, sun, and sand as its natural attractions for the tourism and recreation industries. The USACE needs to reconsider installing a rocks wall around the beaches of Rincón, this is not a wise solution. A beach nourishment project like the one presented for San Juan could provide Rincón with the needed protection to its natural attraction, to property and infrastructure and to the essential recreational and economic opportunities that the municipality considers essential for its economic vitality. Rincón needs a beach nourishment project that includes the structures to protect the sand from running offshore and that guarantees access to recreational and economic opportunities for residents and visitors.

- **Coalición Restauración de Ecosistemas Santurcinos (CRES PR):** The CRES Coalition is a community based environmental organization that has continually documented social, economic and ecologic aspects of San Juan and Carolina Coastal areas, since year 2014. This organization have monitored endangered species and other species that are indicators of the ecosystem health, among them: Dermochelys coracea, Chelonia mydas, Eretmochelys imbricata, Trichechus manatus, Epinephelus striatus, Acropora palmata, Acropora cervicornis, Mycetophyllia ferox, and Dendrogyra cylindrus. These species respond to changes in its habitat (Ramos-Sharron et Al, 2018). Moreover, as part of the activities organized for the "Scientific Citizen", this organization have performed water quality monitoring, coastal profiles, coral transects, coral restoration activities and installation of coral farms. The collected data from monitoring are part of the reasons why CRES understand that the project presented Feasibility study did not include a real cost-benefit analysis for our lives as residents, nor the coastal infrastructure.



The alternatives have shown low effectiveness in long-term wave reduction (Jackson et Al 2006), considering that the project involves an inversion of \$558,530,683.00 and estimated damages of \$245,319,113. In addition, the use of materials with nonrenewable resources (polymer chains) and the lack of spatial analysis about the protected species population dynamics will have a direct impact, altering the critical habitat, circadian cycle specifically in sea grasses, and affecting 14.78 acres of hard bottom with reef populations protected by Federal and State laws. As an organization, coalition, and residents of this coast, we do not support the presented alternatives, as it compromises the live and health of the ecosystem and doesn't respond empirically the following questions:

- How do the changes in the hydrodynamic of the geomorphic and bathymetric polygon caused by the implementation of the selected alternatives affect the environmental quality of the natural resources present at the project areas? (For example, water quality)
- Which criteria were used to determine the possible influence or change caused by the project alternatives in population dynamics of species listed as Threatened and Endangered?
- How will compliance with Clean Water Act and Endangered Species Act be guaranteed during the 50 years of useful life of the proposed project alternatives? (Epinephelus striatus, Acropora palmata, Acropora cervicornis, Mycetophyllia ferox, Dendrogyra cylindrus, Dermochelys coracea, Chelonia mydas, Eretmochelys imbricata, Trichechus manatus)
- How is the Cost / Benefit evaluated for a 50-year projection while maintaining the value of the ecosystem and its ecosystem services?

- **Defensores de Áreas Costeras (DAC):** The project is not consistent with the Puerto Rico Coastal Zone Management Program (PRCZMP). San Juan, is the capital city of Puerto Rico, is where there is the highest concentration of people and hotels that welcome tourists, one of the main resources of the economy.

"The coast of the municipality of San Juan has approximately 40% of the coast where the predominant type of coastline is the armed coast (67%). The armed coast is mostly composed of rigid structures such as bulkhead, docks, breakwaters, jetties, groins, line of rocks or revetments (rip-raps) and concrete walls (seawall)"¹.

This means that only 33% of the San Juan coast are beaches. The USACE proposes to eliminate some of the few beaches in the capital city. However, even more serious is that they propose to eliminate 100% of the beaches of Punta Las Marias, very unacceptable. In addition, the study ignores data and skips considering alternatives.

The study skips to note that the rock revetment will eliminate two beaches, in the western sector of Punta Las Marias. Namely, the beach at the end of Calle Almendro and the beach at the end of Calle Doncella. The deposit of stones on the coast will eliminate the only existing beaches of the Punta Las Marias urbanization. These beaches are part of the coast and have great ecological, recreational and economic value.

They also propose to eliminate accesses to the beach. This is part of the maritime zone and public domain lands, the deposit of stones in this area is contrary to the Puerto Rico Commonwealth Constitution and the public interest.

The project as proposed is not consistent with the Puerto Rico Coastal Zone Management Program (PMZCPR) as it will eliminate two beaches. The PMZCPR identifies beaches as a coastal resource with priceless value for recreation and tourism in Puerto Rico. The PMZCPR was adopted to protect coastal resources, including beaches. The beaches are of

¹ Study about the state of the beaches in Puerto Rico Post-Maria, from Puerto Rico Institute of Coastal Planning and Research (C0RePI-PR), p. 21.



high public interest for recreation, tourism and for the economy. The rocks will prevent the use of the beach for recreation of neighbors, tourists and the public.

The study omits to consider the negative effect that the elimination of beaches will have in the economy. Beaches are one of the main resources for the economy in global travel and tourism industry. Also recognized as one of the sources of income in the U.S. economy².

On the other hand, the study incorrectly states that there are no accesses to the beach through the streets of Punta Las Marias. However, all streets in the sector provide access to the beach, as required by the State Law No. 21 of May 20, 1987 for regulation of controlled access. On the contrary, is the Corps of Engineers who proposes to eliminate access with rock revetment, which is contrary to our system of laws and regulations (Sec. 6.4.2.1 of the PRPB Joint Regulation)

The study omits to consider that there is protection of rocks and wall in the coastal properties of Punta Las Marias. The study omits to consider the alternative of reinforcing the natural reef located few miles north of the coast. The Oceanographer Dr. Miguel Canals have shown how these natural reefs reduce the surf in the area.

The study omits to consider the alternative of creating an artificial reef a few miles away from the coast, like the one proposed for the Marriott hotel, La Concha and Vanderbilt hotel area. (USACE Permit No. SAJ-2018-01543(SP-CGR)).

On the other hand, the USACE incorrectly points out that the proposal complies with all federal and local laws. The USACE must comply with the Puerto Rico state laws specifically, the DNER Regulation No. 4860 and the Joint Regulation established the PR Planning Board and implemented by OGPe.

USACE jurisdiction is limited to the US Waters. These include navigable waters in the coastal sea to the average sea level, rivers and wetlands under interstate commerce. (Sec. 10, Rivers and Harbors Act of 1899 & Sec. 404 Clean Water Act). However, submerged lands under the sea to the maritime zone are under the public domain of the Puerto Rico Government. Any project located within the maritime zone and submerged lands up to 3 leagues offshore (10.25 miles) is under the jurisdiction of the Puerto Rico Commonwealth (Sec. 13 Foraker Act, Organic Law of 1917)

The DNER is the state government agency with jurisdiction over the sea and its shores, and has a duty to:

(h) Exercise the monitoring and conservation of territorial waters, the land submerged under them and the maritime zone, grant franchises, permits and public licenses for their use and exploitation and establish the rights to be paid for them according to the applicable regulations. (Art. 5, Law No. 23 of June 20, 1972)

This ministerial duty of the DNER is implemented under the Regulations for the Use, Surveillance, Conservation and Administration of Territorial Waters, The Submerged Lands under these and the Terrestrial Maritime Zone (Regulation No. 4860). Regulation No. 4860 is fully applicable to the project and establishes countless criteria and requirements prior to the authorization of use within the maritime zone and submerged lands.

That is, the DNER must consider and approve all land uses and occupation comprising the USACE project. Regulation Number 4860 also requires environmental analysis and public

² The Economic Value of beach, R. Houston, Shore & Beach 81(1), p5

participation. About environmental analysis, the provisions of the Environmental Public Policy Act also apply. Given the scope of the proposed project alternative, the preparation of an Environmental Impact Statement will be necessary.

It should be noted that the DNER in coordination with the PR Planning Board (PRPB), also have the duty to implement the PR Coastal Zone Management Program through the different laws and regulations they administer.

The PRPB is responsible for ensuring the land use in accordance with the public policy of the Puerto Rico Land Use Plan. This public policy is implemented through the Joint Regulation 2020, which entered into force on January 2, 2021. The Chapter 6.4 of this Regulation guides and controls the use and development of land and water bodies of water within the coast. All this with the interest of protecting coastal resources and promoting access to beaches.

The PRPB determination should be consistent with its determination just a year ago in the application #CZ-2019-0312-091, in which it determined that the rock revetment proposed on the beach at the end of Calle Almendro in Punta Las Marias is not consistent with the PMZCPR. (See the PRPB Resolution of February 21, 2020).

Therefore, we respectfully request from the Planning Board to determine that the project proposed by the USACE is not consistent with the PRCZMP.

- **Coralations:** I just received the notice regarding the proposed plans for massive beach re-nourishment along the north coast of Puerto Rico. This project is of great concern because the science demonstrates beach that re-nourishment does not accomplish what it intends, as dynamic oceanographic forces ultimately govern sand deposition and withdrawal. Worse, beach re-nourishment projects suffocate shoreline shallow rocky / reef habitat critical to reef fish reproduction, before the projects fail.

The number of species this project will affect is not limited to the 16 threatened and endangered species listed, and that it clearly will profoundly impact, irrespective of even properly implemented best management practices. We also respectfully request a copy of the environmental impact document, (Draft integrated feasibility report and environmental assessment?) and the Section 7 analysis. It is not clear if the section 7 analysis has been completed. While this project seems far along, and listed species are mentioned, there was no mention that the waters in which this is being planned were listed as Critical Habitat for acroporid corals in 2008.

- **GK Realty:** In summary, we find that the proposal presented for Punta las Marias is not consistent with the Puerto Rico Coastal Zone Management Program, so the Federal Consistency Certification must be denied.

- **Existing Shoreline Conditions:**

According to the description of the existing conditions in the Feasibility Report (page 2-33), it wrongly characterizes the zone as one with little or no dry beach. In fact, a more careful inspection would have identified that at the end of Calle Almendro there is a seasonal beach and that in other places, sand deposits can also be observed. The erroneous characterization of the Punta Las Marias sector as a place without beaches prevents certifying its consistency with the PR Coastal Zone Management Program, because among the nine important coastal resources identified in the Program, one of them is precisely the beach resource.

"The beaches of Puerto Rico are coastal resources of great importance. These beaches vary from tiny pockets to broad deposits as much as a

*kilometer in length (e.g., Medialuna Beach in Loiza, Levittown beach). Beaches are of incalculable importance to Puerto Rico for recreation and tourism."*³

One of the innovations of the Program was the implementation of studies and regulatory changes to guarantee citizen access to the beaches of Puerto Rico in recognition that it belongs to the People of Puerto Rico, and that they are of incalculable value for recreation, tourism and the use and enjoyment of the citizens.

The recommendation of the Corps of Engineers for this area is contrary to the public policy set forth by the Government of Puerto Rico since 1978 when the Program was initially adopted. Those policies have remained unchanged and the legislative and regulatory record has consistently supported this goal.

Hiding the existence of beaches in a Study does not eliminate them. What would eliminate them would be the unusual proposal of the USACE to deposit of a stone revetment on the beaches, eliminating them instead of conserving them as required by the current Program.

The coastal sector between the Park Boulevard Condominium and Punta Las Marías, allegedly is characterized by a "seawall", but a detailed examination would identify that the location of this boardwalk is not uniform, some of these are located on the edge of seasonal beaches.

The deposit of rocks in the Punta Las Marías sector is contrary to the enacted policies because it would not be occurring offshore of retaining walls as erroneously alleged in the study, but, it would be on stretches of coast that are currently permanent beaches or stationary.

The study erroneously concludes that the five accesses to the beach in the Punta Las Marías sector are blocked, as shown in Figure number 2-28 of the Puerto Rico Coastal Study Draft Integrated Feasibility Report and Environmental Assessment. According to the San Juan Municipal Government files, all these are public accesses to the coast. The lack of pedestrian access to the coast is currently not a legal problem but a physical one. The deplorable and dangerous conditions of Calle Almendro impede safe access to beach level impossible.

In other streets, such as Calle Bucaré, stairs to the sea have even been built that allow residents to access the beach at the end of Calle Almendro. Contrary to what the Corps of Engineers alleges in the Study, residents have maintained and improved access to the coast, another of the pillars of the Coastal Zone Management Program. The works proposed in the USACE Feasibility Report by the Corps of Engineers will be violating the established rules that require maintaining existing accesses to the coast and require increasing and improving it. The works proposed by the USACE would prevent public access to the coast in front of Punta Las Marías and access to other beaches extending to "Último Trolley Beach".

In the Table number 7, APPENDIX H of the Feasibility Report, "Public Access and Cost Sharing", the end of Calle Almendro is correctly identified as a public access, but not the existing public accesses on Bucaré, Caoba, Doncellas and Emajagua streets in Punta Las Marías. These areas are wrongly recognized only as "Street ends" and not as public accesses. This anomaly in the presented information and data must be

³ PR Coastal Zone Management Program, 1978



corrected. The deposit of rocks in these accesses (street ends) would be very contrary to the Puerto Rico Coastal Zone Management (PRCZMP) policies.

The Puerto Rico Planning Board (PRPB) "Joint Regulations for the Evaluation and Issuance of Permits Related to Development, Land Use and Business Operation" in section 6.4.2.1 (d) establishes the following concerning public accesses:

"Public access to beaches, coasts and lake coastlines will be kept free of obstructions. The construction, without obtaining permission to do so, including fences, gates and maritime buoys with "No Pass" signs or similar, the excavation of the pavement or ditches through public access or the construction of structures within the access easement will be considered as obstructions to access and a violation of this Regulation."

It is unacceptable that the US Army Corps of Engineers ignores that Puerto Rico counts with a PRCZMP since 1978; a Zoning Regulation of Puerto Rico Coastal Zone and Beach Accesses (Planning Regulation Number 17); a Regulation for the Use, Surveillance, Conservation and Administration of Territorial Waters, Submerged lands and the Maritime-Terrestrial Zone (Regulation Number 4860); a Land Use Plan for the Municipality of San Juan since year 2003; "Joint Regulations for the Evaluation and Issuance of Permits Related to Development, Land Use and Business Operation (Joint Regulation) which was recently amended and effective since January 2, 2021"; and Regulation on Special Flood Risk Areas (Planning Regulation Number 13), recently amended and effective since January 9, 2021. Ignoring this regulatory context is equally offbeat as ignoring the existence of beaches and public accesses as mentioned above. By misrepresenting the physical and regulatory reality of the selected reach areas, the results of the Feasibility Study are equally erroneous and inconsistent with the public policies, laws and regulations that are enforceable, so the Federal Consistency Certification with the PRCZMP that has been requested from the Planning Board must be denied.

In relation to the screening of management measures presented in the Feasibility Study, one of the criteria includes maintaining the recreational use of the beach areas close to the coast. According to this criterion, an inventory of beaches is included for each reach, but unfortunately, the seasonal beach that exists at the end of the Almendro Street is not mentioned in the document. The deficient inventory, which excludes the reality of the distribution of the beaches, prevents a Federal Consistency Certification from being granted.

In section 3.7.1 of the Feasibility Study, it concludes that the only option for the west side of Punta Las Marias is the deposit of stones, without identifying and discussing other measures that exist to achieve the stated objectives.

In conclusion, if the study had recognized the existing conditions in Punta Las Marias area, other recommendations would have been made. But even without the examination of the existing conditions, the lack of criteria for the selection of a single alternative to no action for Punta Las Marias Headland segment, and the lack of discussion of the applicable regulations in this area, requires that the Federal Consistency Certification with the Coastal Zone Management Program for the proposed rock revetment is denied.

G-K Realty also provided copy of a detailed study carried out by Taylor Engineering on the conditions of the coast of Punta las Marias. This study was entrusted by a group of residents and visitors of the Punta Las Marias area that are organized under "**Concilio de Preservación Costera**", which is a non-profit corporation created with the purpose of conserving, preserving and rehabilitating the coast and street ends in Punta las Marias. The study was carried out to establish some recommendations to repair the beach access

at the end of Almendro Street, the sheet pile wall of the Azure Condominium and to extend the duration and preservation of the seasonal beach at the end of Almendro Street. The Taylor Engineering Study demonstrates that contrary to what the USACE alleges, there exist other viable alternatives to preserve the beach, avoid erosion and rehabilitate the access of Calle Almendro, which would be consistent with the PMZCPR. See "Taylor Engineering Study" (Annex 2)" for more details.

- **Four (4) residents** of the Ocean Park area and a citizen expressed in favor of the proposed alternatives presented in the PR Coastal Study Feasibility Report.
- **Mr. Lucas Cambo** commented that considering the width of most of Condado and Ocean park beach (sand) area, installing berms would eliminate the use of those beaches. Berms in tight urban areas like Ocean Park are used by criminals to hide. The permanent wise solution is alt 4 (breakwaters). Once installed the beaches could be nourished with new sand, not berms. Berms eliminate the flat area bathers use and promote criminal activities and in real storm surge the sand end up in the streets and properties, protecting nothing! Please use Alt. 4 only.
- **Mr. Eduardo Martinez**, owner of a property in Córcega, Rincón commented that the proposed revetment would have an irreversible impact on this area. In many coastal systems of Puerto Rico, the beach sand moves from the mouth of the rivers towards the coastline in the direction of the prevailing maritime current. This type of sand supply/transport system is known as Littoral Cell. The movement of the sands in these transport systems carries it from the river towards the coast and then, the sand continues to deep areas where it is lost. If sand is removed from these rivers that supply the coasts, loss of sand is greater than what is deposited on the coast, thus causing the size of the beaches to be reduced. Accelerated erosion without a supply of sand is one of the main causes of the loss of sand from our beaches. Municipalities such as Rincón and Córcega sector has been one of the most affected in recent years. The removal of sand from rivers and creeks that supply it to the beaches does not allow these beaches to replenish their sand levels. Therefore, the use of shoreline revetments will protect the properties, but the sand will disappear in this area. I understand that the use of breakwaters or technology such as Undercurrent Stabilizers are necessary to prevent the loss of sand, which is of utmost importance for sea turtle nesting and tourism in this area. The use of Undercurrent Stabilizers has been very effective in some areas of US and the cost is not that high. Finally, the "Beach Nourishment" is extremely necessary. It is essential to preserve the sand in this area since the sea turtles nest in Corcega Beach annually and we have witnessed this event. On the other hand, in the Tentatively Selected Plan, the USACE did not choose the option of breakwater and Beach Nourishment since the Benefit/Cost ratio is less than 1, most likely because in the Corcega area they are proposing the construction of 20 breakwaters. Fewer breakwaters or other alternatives such as jettys or "undercurrent stabilizers" will function.
- **Maritza Barreto Orta, Geomorphologist and Professor of the University of Puerto Rico, Rio Piedras** commented that based on the evaluation of the document, she understands and agrees that the areas identified for intervention in San Juan and Rincón needs immediate attention to solve the erosion problem. However, several points about the Tentatively Selected Plan should be clarified and addressed at this level of the process, where there is still room to amend it.

Comments and specific questions to clarify are:

1. Ocean Park Pocket Beach

- a. Regarding the proposed beach nourishment, it is not clear which will be the specific places or section of the beach will be intervened, lateral extension (in meters) to



cover, absolute location (coordinates) covered by the proposed nourishment. Clarify which sections of the beach level will not be nourished.

- b. It is not clear if the two (2) proposed beach re-nourishments will be sufficient within the 50 years of useful life of the project. It is not clear if the proposed re-nourishments are established as initial interventions and the local government will need to request additional re-nourishments. It is important to clarify this detail and inform the local government early in the process to carry out the necessary steps to obtaining (Federal funds proposals), identify or reserve the necessary funds at the required time frame.
- c. Clarify how possible changes in the berm dimensions during the PED phase may change the definition of beach impacts, if any. This detail is important for the evaluation of permits.
- d. Clarify the exact location of the eight (8) proposed detached breakwaters. It is not clear if the function of the eight (8) detached breakwaters is to retain the deposited sand as part of the nourishment intervention, to generate additional functions of infrastructure protection or both.
 - Which parcels of the zone will protected by the detached breakwaters?
 - How could the parcels located out of the breakwater protection be affected?
 - How could the width of the beach near the location of the breakwaters be affected? The latter thinking about the possibility of nesting areas for turtles.
 - How could the location of these 8 breakwaters affect the natural beach feeding process that occurs in the area with the occurrence of winter swells, if any?
 - Identify the agency's recommendations to the Government of Puerto Rico on what would be the steps to follow from now on to face the scenario when the structures cease to function in 50 years.

2. Condado Pocket beach: As in the case of Ocean Park Beach, it is necessary to clarify the exact location and lateral extensions of the beach to be covered by the proposed nourishment. Clarify if the two (2) re-nourishments are initial and if additional funds will be required for additional re-nourishments based on needs.

3. Punta Piedrita Headland: Clarify how the revetment will affect the beach width in adjacent beaches.

4. Punta Las Marias: According to the document, the justification to intervene with a revetment in this area is that there is no dry beach. The question is: Isn't there the possibility of evaluating an intervention that promotes restoration, recovery and conservation of beaches in this area?

- It is necessary to identify the parcels that will be directly affected with the construction of the revetment and the parcels that will not be directly impacted.

5. Rincón

- a. The location of the revetment is not clear, nor will its lateral extension, and which parcels be directly impacted. It is not clear from this first point, how the location of the structure will affect the beach width in beaches that are still present in some areas from Quebrada Los Ramos to Playa Córcega, especially those between eroded zones that are showing recovery, according to the recently published Post-Maria Beach Assessment, August 25, 2020. (see the web map of the state of the beaches for the area).
https://storymaps.arcgis.com/stories/dfb5b1a22af6440b809cde3aac482b42?fbclid=IwAR2zL3lVnHSbAVFml33zeyOk1fYuIO1Dm_F3uwUznlaGdF079sXjaQCgvo
- b. It is not clear how the proposed revetment will affect the beach width in other beaches located at north of Los Ramos Creek, which present accumulation of sand (accretion) according to the Post-Maria Beach Assessment.
- c. Clarify if the Cost-benefit analysis consider possible impacts of the revetment in other beaches of the area by reducing its width.

- d. The parcels that will be directly impacted by the revetment construction must be identified.

- **Miguel F. Canals Silander, PhD, Specialist in Oceanography and Coastal Engineering:**

The selected areas meet the "standard" economic viability requirements established by USACE. However, there are other requiring study and intervention, but the economic justification may be more difficult. Therefore, the government of PR and COR3, must talk with the USACE so that certain waivers are granted to PR to have greater access to funds for the recovery of the coasts. Even the matching component required for the Rincon and SJ projects are significant, it is not clear if the state government will be able to provide those funds or will be requesting a waiver.

The BEACH-FX is not designed for the Puerto Rico waters, with reef areas and a mix of sand and reef / hard bottom. The PRPB should have/hire experts to rigorously evaluate these models, in collaboration with the DNER. This evaluation has not been done in a rigorous and quantitative manner due to lack of funds.

The revetment alternative proposed for Rincon must be totally discarded. A mile-long revetment is not an option that will be accepted by the community of Rincon. I strongly encourage the USACE to work with community members and local experts on the formulation of an alternate plan that includes a hybrid approach combining detached breakwaters, small scale beach nourishment, and revetments along some critical sections of the coastline.

- **Pablo A. Mendez Lázaro, PhD, Department of Environmental Health, Puerto Rico Medical Sciences School**

Ocean Park is a sub-neighborhood (Sub-barrio) of Santurce in the city of San Juan. Its population reached 1,667 in the 2010 census. The number of housing units is 1,279. The area is .52 km ² in a flat area of urban coastal zone. To the north is the Atlantic Ocean. The elevation of the area is between zero to ten meters above sea level. Historically it is a swampy area. Its defenses against the sea water are the coral reefs that are still alive and two pump stations, "Casa de Bombas de Diego" and "Casa de Bombas Baldorioty de Castro".

Currently, there is a collaborative process between residents of the Ocean Park community, the University of Puerto Rico-Medical Sciences Campus, the UPR Mayagüez campus and the Department of Natural Resources in a project called "Action Plans for Climate Change in coastal communities of PR to improve the quality of life: collaborative approach." Through it, focus groups and meetings have already occurred to explore concepts, possible solutions, community desire, and the power of collaboration. The priorities are coastal erosion events, extreme heat, and urban flooding. In previous activities, Ocean Park participants and residents who suffer from these problems would like not only physical solutions but also regulations and actions (structural and non-structural). Residents have been very emphatic on the idea of planting reefs. Reef seeding would help to prevent coastal erosion and urban (coastal) flooding. Additionally, there is an agreement that requires an education process about the project and preventive efforts.

For the Ocean Park area "Nature Based Solutions" should be considered. Nature-based solutions are those that involve working with "nature" (or enhancers of it) to help meet societal challenges. These involve a range of actions, such as the protection and management of natural and semi-natural ecosystems, the incorporation of green and blue infrastructure in urban areas, and the application of eco-systemic principles as the basis of systems. It is an "umbrella" concept for ecosystem-based adaptation and mitigation approaches, natural disaster risk reduction and green infrastructure. Recently it is

attributed the lexical synonym for natural climate solutions or "natural climate solutionsn (NCS) or" Engineering with Nature "(EWN). EWN's overall vision is to foster ann approach where nature and human engineering are partners in infrastructure development. Both approaches already accepted by USACE.n

As a community, Ocean Park recognizes that solutions must be implemented on a large scale, not just for the individual, but for the common good of the coastal region. Then preliminary findings and recommendations of the USACE Coastal Study of Puerto Rico are considered positive and I hope that it will eventually become a reality.

- Aurelio Mercado, PhD, University of Puerto Rico, Mayagüez:

Years ago, I wrote that if bad planning on our coasts continued as it was then, citizens and tourists who wanted to bathe in a sandy beach would have to travel to one of the fewn remaining beaches, since the rest of our beaches would have disappeared for one reasonn or another.nI just received literature from the Puerto Rican Planning Society (SPP)n announcing its celebration of Planning Week: Planning for a Sustainable Puerto Rico. Itn is worth noting that sustainable planning is also framed in our Constitution, where it isn said of the need to preserve our environmentnfor the use and enjoyment of future generations. So, we are talking about bigger words.

You don't need to be a planner to understand the damage that the Puerto Rico Planningn Board (PRPB) and the Department of Natural and Environmental Resources (DNER) make to our coasts (among others). It is very simple:n

- 1- The PRPB, as usual, continues to issue construction or reconstruction permits in vulnerable areas of our coasts;
- 2- All this occurs under the unstoppable rise in sea level,nwhich shows a historical trend of 2.05 mm / year for the tide gauge in San Juan Bay, and 1.92 mm / year for Isla Magueyes (Lajas) (but these are historical trends, and in the decade 2010-2020 these values have tripled, and even quadrupled), and under the increase in the frequency of intense hurricanes;
- 3- It doesn't take many years for the waves to eat away at the beaches and begin ton threaten the structures, many of which collapse scattering pieces of cement, rods, wires, etc., along the beach, which becomes unusable;
- 4- The owners apply for permits to throw rocks in front of their structures (the ones that have not yet collapsed), and the permit is granted; or, n
- 5- If the damages are extensive, apply for federal assistance at the United States Corps of Engineers;
 - The USACE perform a study of Benefit / Cost and; n
 - Concludes that, of the three main options (retreat, re-feed the beach,n construction of walls, coatings, breakwaters) the one that yields the higher B/C ratio is to build the beach (fill it with rocks and walls).

n The result of this process is the loss of coastal segments that are rendered unusable forn your enjoyment. This has already happened in the United States, but there they have more money and lobbyists to carry out beach nourishment.

n Points 1 to 4 have already been happening for many years. Just take a walk along the coasts of the island. Point 5 began to take shape a few years ago, and it is a matter of reading the plans for Loíza, Rincón, Isabela, Mayagüez and San Juan. And as the years go by, the disastrous combination of PRPB / DNER on the one hand, and nature on the other,n destroy the sandy beaches, as I said many years ago. In a recent study in Hawaii they concluded that, if there is not a reconceptualization of the management of the beaches,n before 2050 they will have lost a large amount of these. And it must be done now. But,n for that we have a JP in Puerto Rico, right?n

- **Thomas Joaquin Fritz, PhD, Global Reef Alliance**

The breakwater design chosen by USACE for this project is both the most expensive and the most environmentally damaging option for this site. It will ultimately fail for the same reason all such solid vertical breakwaters fail in the long run: they focus all the wave energy on themselves, until they are undermined, crumble, collapse, and need to be rebuilt, just like the long series of ruined seawalls that can be seen along this shoreline.

We urgently recommend that the Government of Puerto Rico Department of Natural and Environmental Resources (DNER) learn from the past and evaluate the much cheaper and far more environmentally beneficial alternatives that have been ignored in choosing this inferior option. They have ignored methods that regenerate real coral reefs, beaches, and all their environmental services at much lower cost.

The beaches of Santurce were built by the living coral reef in front of it. These provided holes and passages that dissipate up to 97% of wave energy offshore, causing sand beaches to grow instead of being eroded. At the same time the living coral reef is a factory for generating new white limestone sand, fisheries habitat, biodiversity, and ecotourism at no cost.

Biorock electric reef technology, invented in the Caribbean, grows limestone coral reef frameworks in any size or shape, which grow back severely eroded beaches naturally at record rates. Waves lose energy by passing through them without being reflected, so they avoid the erosion that solid breakwaters and seawalls cause in front of them.

After reviewing the submitted documents and received comments, the Puerto Rico Planning Board (PRPB) made the following findings:

- 1- The DNER is the Non-Federal sponsor of the PR Coastal Study and the recommended alternatives. The DNER is also the state agency responsible for the administration and enforcement of the PRCZMP public policies that apply to the management of the beaches to be intervened through the alternatives presented in the Feasibility Study at reference. This agency has consistently expressed concerns and objection to the Tentatively Selected Plan as presented.
- 2- The PRCZMP recognizes the beaches of Puerto Rico as a resource of **incalculable** importance for recreation and tourism and establishes the following enforceable policies in relation to its conservation and management:
 - Shorefront development, governmental and private, shall if practical be designed to facilitate rather than obstruct shoreline access by the general public. (Chapter 3, page 75 of the PRCZMP)
 - According to Article 5(h) of Law Number 23 of June 20, 1972 (DNER Organic Law), the DNER Secretary have the faculty of exerting vigilance and conservation of territorial waters, submerged lands under it and the maritime-terrestrial zone, grant franchises, permits and public licenses for its use and exploitation and establish the rights to pay for it. For these purpose, the DNER Secretary shall be empowered to exercise those powers and faculties that may be delegated by any Federal agency or instrumentality under any law of the United States Congress.
 - Article 1.4 of the DNER "Regulation for Exploitation, Vigilance, Conservation and Administration of the Territorial Waters, Submerged Lands and the Maritime-Terrestrial Zone" (Regulation Number 4860) establishes the following guiding principles:

A(1) The use of the maritime-terrestrial public domain will be public and free for common uses and in accordance with its nature, such as walking, sitting, bathing and other similar acts that do not require works and facilities of any kind and that are carried out in accordance with the PR Commonwealth laws and regulations.

A(5) The beaches will not be for private use, without prejudice to what is established in these Regulations.

A(6) The uses and constructions that are allowed in beaches, in addition to complying with the provisions of the previous paragraph, will be freely accessible to the public, unless for political, economic or other duly justified reasons other modes of use are authorized.

3- According to received comments, residents and other stakeholders expressed objection to the revetment proposed as alternative in Punta Las Marias. The DNER, Experts in Coastal Management and other stakeholders have also express concern and objection to the proposed revetments in Rincón, Punta Piedrita and Punta Las Marias.

Considering the above-mentioned findings, the Puerto Rico Planning Board (PRPB), in its meeting of March 3, 2021 determined not to concur with the Federal Consistency Determination issued by the USACE for the Feasibility Report at reference. The PRPB provide the following recommendations to make this Federal Activity consistent at maximum extent practicable with the PRCZMP:

- 1- The USACE must evaluate and discuss with the sponsor (DNER) other viable alternatives for Rincón, Punta Piedrita and Punta Las Marias, considering public access to the beaches. Apply efforts to improve the existing conditions for better enjoyment of citizens and tourists.
- 2- Consider "Engineering with Nature" alternatives that will help to recover and maintain the beaches and enhance the coastal ecosystems within the selected study areas.
- 3- The involvement and participation of stakeholders (especially residents and directly affected citizens) and local government in the planning process of the alternatives is of vital importance so that the design to build is effective in achieving the established objectives.
- 4- Use the best available data and tools to perform the required modelling and analysis considering the Puerto Rico island conditions. The DNER, the University of Puerto Rico and other Non-Governmental Organizations may collaborate with the USACE in providing the required updated data and studies.
- 5- The USACE must complete an analysis to evaluate how the proposed alternatives affects the coastal floodplain levels as established by the Federal Emergency Management Agency (FEMA) in their Flood Insurance Rate Maps. The Puerto Rico Planning Board is the designated agency for administration of the National Flood Insurance Program (NFIP) and the PRCZMP enforceable Planning Regulation Number 13 (Regulation for Special Flood Risk Areas). Therefore, it is important to coordinate this aspect with the Puerto Rico Planning Board.

The Puerto Rico Planning Board is in the best disposition to assist and collaborate with the USACE in this important effort.

The following parties shall be notified: **Angela E. Dunn**, U.S. Army Corps of Engineers; **Rafael A. Machargo Maldonado**, Department of Natural and Environmental Resources (DNER); **Idelfonso Ruiz Velez**, Puerto Rico Coastal Zone Management Program, DNER; **Brenda Torres Barreto**, Director, San Juan Bay Estuary Program; **Brenda Toraño Díaz**; **Maretza Rodríguez**

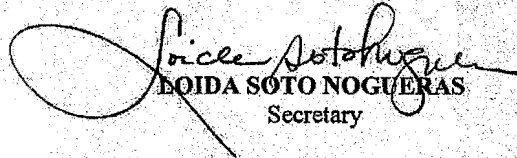
Portela, GK Realty; Yvette Nuñez Sepúlveda, CRES PR; Ruperto Chaparro, Sea Grant and; Diana López Feliciano, Defensores de Areas Costeras.

MANUEL A. G. HIDALGO RIVERA, PPL

Designated President

Certify: That this Resolution is copy of the agreement adopted by Puerto Rico Planning Board (PRPB) in its meeting of March 3, 2021. I expedite and notify this copy to the parties under my sign and official stamp of the Puerto Rico Planning Board for general use and knowledge.

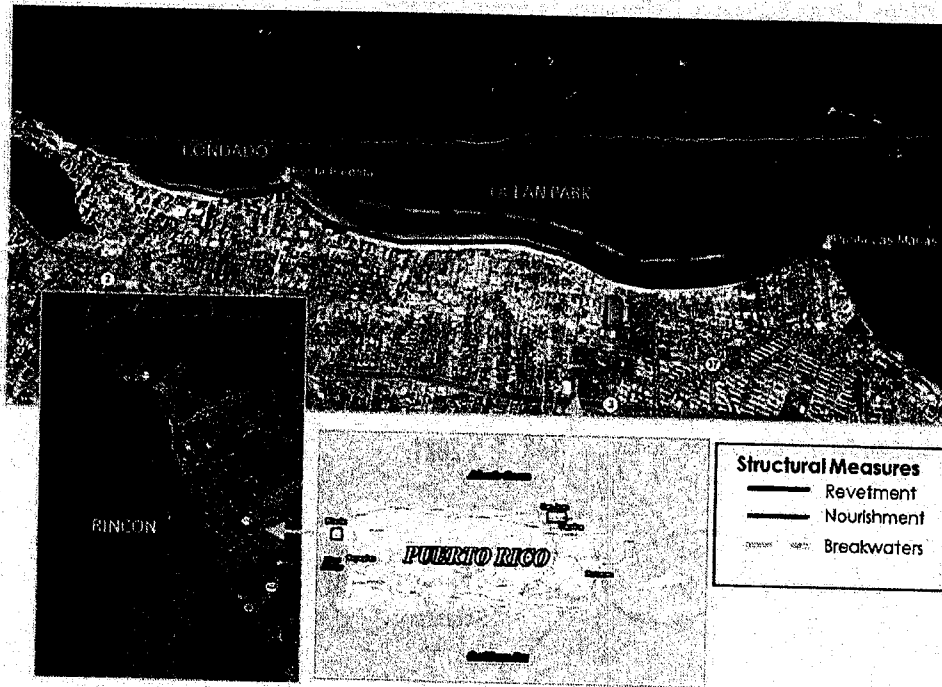
In San Juan, Puerto Rico, today **MAR 15 2021**


LOIDA SOTO NOGUERAS
Secretary



GOBIERNO DE PUERTO RICO
JUNTA DE PLANIFICACIÓN

Location of Structural Features of the Tentatively Selected Plan



San Juan Study Area and one reach within the Rincon Study Area. The Study notes the combinations as well as the features themselves may change during the project's pre-construction engineering and design phase (PED) partly because modeling studies of project effects are not complete. Consequently, the TSP does not quantify total benefits and does not identify the National Economic Development (NED) plan. Currently, the TSP proposes:

- Beach nourishment (1,910 feet) along Condado Pocket Beach shoreline using sand from an upland source;
- Stone revetment on Punta Piedrita headland (2,450 feet);
- A breakwater field in combination with beach nourishment protecting 6,810 feet along the Ocean Park Pocket Beach shoreline using sand from an upland source;
- Stone revetment on the western side of Punta Las Marias headland (1,400 feet); and
- Stone revetment along the Rincon shoreline (5,650 feet).

Impacts from the work to EFH are still to be determined. The Study's EFH section does not include recent, site-specific surveys for hardbottom, coral, coral reef, seagrass, and mangrove habitats. The references to past studies are either incomplete (i.e., cited studies are missing from the Study's references section) or unclear because bibliographic software has replaced the in-text citations with error messages. From our experience, Study data are from the NOAA project "Benthic Habitat Mapping in Puerto Rico and the U.S. Virgin Islands for a Baseline Inventory," conducted during 2000 to 2002, making the data twenty years old. When discussing EFH impacts, the Study Appendix G notes acreages and characterization provided are incomplete and will be updated during PED when project elements are closer to their final design and site-specific surveys are available. Noting those caveats, the Study estimates 14.75 acres of impact to coral and hardbottom habitat. Study Appendix G notes the District will develop during PED the mitigation proposed for the unavoidable impacts to coral, hardbottom, and other habitats.

Effects to ESA-listed species and designated critical habitat within the action area are still to be determined. The BA does not provide sufficient detail to evaluate impacts to ESA-listed corals and designated critical habitat for elkhorn and staghorn corals due to the lack of recent, site-specific surveys for coral, and corals reef and hardbottom habitats. Further, information on the presence, usage, and potential adverse effects on ESA-listed sea turtles is also lacking, given the known adverse effects of breakwaters on swimming adult females attempting to access nesting beaches and swimming hatchlings attempting to access deep water. The BA states that the TSP could potentially directly impact approximately 14.8 acres of hardbottom habitat, and that these are preliminary estimates that are expected to change once updated field surveys can be conducted. Further, the BA neither references nor evaluates impacts of the proposed mitigation plan, which would need to be evaluated as part of the proposed action.

In conclusion, NMFS does not believe the Study has adequate information to describe fully the proposed action or the potential impacts to ESA-listed species, designated critical habitat, or EFH. The Study indicates the additional information we require will not be available until PED. The additional time and funding commonly available during PED will allow the Jacksonville District to conduct more extensive and updated surveys within the action area to inform the development of a Biological Opinion and complete EFH consultation. To diminish the risk of needing to reinitiate consultation, NMFS recommends the Jacksonville District withdraw its current requests for ESA and EFH consultations at this time and pursue consultation during PED.

The NMFS further suggests the Jacksonville District convene a multi-agency workgroup to assist with developing the various data gathering plans necessary to support a successful project. In the meantime, the NMFS intends to provide within a few weeks a technical assistance letter advising on the information necessary to complete the EFH and ESA consultations.

The NMFS appreciates the opportunity to provide these comments. Please direct related EFH correspondence to the attention of Mr. José A. Rivera at Jose.A.Rivera@noaa.gov. Please direct related ESA correspondence to the attention of Helena Antoun at Helena.Antoun@noaa.gov.

Sincerely,

Andrew J. Strelcheck
Acting Regional Administrator

cc: CESAJ, DeMarco, Dunn
FWS, Lopez, Rivera
F/SER3, Bernhart, Antoun, Schull
F/SER4, Fay, Wilber, Rivera

MEMORANDUM FOR RECORD

SUBJECT: Puerto Rico Coastal Study, Endangered Species & Essential Fish Habitat Consultation Restart

Date & Time: Monday 31 January 2022 (2pm – 3:30pm Atlantic) (1:00pm – 2:30pm Eastern) Virtual

Attendees:

USACE	Frank Veraldi – RTS Restoration Ecologist/NEPA Specialist, CELRD Planning Carolina Burnette – Civil/Coastal Engineer – Jacksonville Coastal/Navigation Planning Hunter Bredesen – Coastal Engineering – Jacksonville Engineering Andrew LoSchiavo – Senior Biologist – Jacksonville Planning
NMFS	Jennifer Schull –Protected Resources, Coral Conservation Branch Chief, SE Region Jose Rivera – Habitat Conservation Helena Antoun – Section 7 Biologist Pace Wilber – NA Jocelyn Karazsia – Habitat Conservation
USFWS	Marelisa Rivera – Supervisor USFWS – Section 7 Consultation Felix Lopez – Endangered Species Coordinator Angel Santiago – NA Jose (Joey) Cruz-Burgos – Endangered Species Coordinator

1. USACE study team members for the Puerto Rico Coastal Risk Management Study met with regulatory agencies that have jurisdiction over fish and wildlife resources in Puerto Rico. The main goal of this restart effort was to provide the basis for being more collaborative and transparent. It also sets the stage for assessing natural and nature-based features in a more holistic way to achieve sustainability, a healthy ecosystem, a productive economy, and safeguards the views and needs of the Puerto Rico Commonwealth.
2. Team members from USACE, NMFS and USFWS generally discussed roles, responsibilities, and consultation processes. The USACE is the lead for planning and designing a justifiable coastal risk management study/project, and implementation of NEPA and Section 404. The USFWS is responsible for (ESA Section 7) protecting federally listed species and their critical habitats above the waterline. NMFS is responsible for (ESA Section 7) protecting federally listed species and their critical habitats below the waterline; and responsible for protecting Essential Fish Habitat under the Magnuson–Stevens Fishery Conservation and Management Act. This three-pronged consultation will require different types of submissions and supporting data. NMFS and USFWS were very supportive and indicated that the USACE team can rely on the agencies for guidance (See Bullet Point#7 Due-out a).
3. Previous Technical Guidance – The USACE reviewed technical guidance provided by NMFS and USFWS in past letters and meetings. To achieve compliance during the feasibility phase, the following recommend plan information would be provided in the report and consultation documentation:

- a. A footprint will be provided for any features or activities that are part of the recommended plan. If siting cannot be exact, a buffer zone will be placed around the feature in which it may be moved within. This will allow for “worst case scenario” direct and indirect affects to be discussed. The location(s) of features will be provided on a habitat overlap map derived from the environmental surveys to be completed late spring 2022. Mapping and feature placement would start with generalized locations and types, but at the point of the final report, specific features would be shown how they overlap with EFH and/or critical ESA habitats.
 - b. Currently, there is potential for recommending beach nourishment. Potential sand sources include both upland and aquatic, with preference towards upland sources taken from mines that are already permitted and operating. Concern for nourishment material composition was expressed by USFWS. In past projects they have seen nourishment materials high in clay, silts, and calcareous materials, which can turn into hardpan and impact sea turtle habitat, native plant growing mediums, and recreational beach compatibility. For measures or features recommended that entail the placement of sand above the waterline and/or within the surf-zone, a set of design criteria for the compatibility of sand would be provided. Parameters would be developed early on to ensure sand materials are compatible with dune, beach, turtle, and fish habitats, and recreational uses. Some parameters may include grain size, organics, chemical constituents, placement zones, placement methods, and timing (See Bullet Point #6 and #7 Due-out b).
 - c. The USACE will utilize hydrodynamic models to the maximum extent possible in determining direct and indirect effects from the placement of features or activities recommended. The USACE will also look at other projects already or being implemented, such as the Aguadilla Break Water, Condado Reefs, and Ocean Park projects. Project ecologists will work closely with modelers and engineers to ensure translation from engineering outputs to physical/biological effects are accurate.
 - d. The USACE will provide to the maximum extent possible verbal descriptions of proposed construction methodologies, equipment, sequencing, and durations, inclusive of operations and maintenance activities.
 - e. The USACE will be looking at ways to minimize size and extent of features by having alternative combinations that work together and with nature. Amongst traditional engineering structures, natural & nature-based features are being considered during the restart plan formulation and upcoming public planning meetings.
4. Benthic Habitat Surveys – The surveys for corals, sea grasses, ESA species, and critical habitats wasn’t discussed in detail, but had been coordinated with NMFS prior to contract award. Preliminary coordination was brief due to time constraints in obtaining the data for keeping this study on schedule. Survey protocols and requirements were in line with NMFS protocols provided and are considered by the USACE to be sufficient for characterization, effects assessment, and habitat model needs. Surveys will also provide information for plan formulation, either in avoidance and minimization, or highlighting opportunities for engineering with nature. Currently, the surveys were awarded in February 2022, with general mapping information to be provided in April – June to support plan formulation. NMFS will support QA/QC by reviewing select materials, data, and other items generated by the contractor.
5. Generalized Measures Discussion – Features such as *concrete seawalls*, *sheet pile*, or *rock revetments* on dunes, beaches or other types of habitats will have adverse effects and likely require mitigation. NMFS, USFWS, and USACE biologists/ecologists agreed on this topic. Avoidance and minimization planning is recommended for these types of features. The use of

artificial reefs in place of *engineered breakwaters* and *T-groins* could avoid and minimize effects, and in some instances provide additional habitat. For these types of structures to function as nature-based features, guidelines for artificial reef construction from NMFS and USACE ERDC would be followed. *Emergent* forms of these structures could have adverse effects in terms of predation, fragmentation, and longshore sand transport. *Beach nourishment*, *dune enhancement/creation*, and *native vegetation* would be acceptable with appropriate sand material criteria, sequencing, timing, and locations. Thoughtful beach nourishment could specifically increase and sustain Sea Turtle nesting habitat.

6. Sand Sources Discussion – Assumptions about upland sand sources were confirmed. Permitted and operating sand mines would have no effects or assessment needed. Reopening a mine that was in operation but now closed would have to consider the reestablishment of habitat. This may entail adding conservation measures to the contract, or potential mitigation if habitat has succeeded and is now providing critical habitat for upland species such as the Puerto Rican Boa, Puerto Rican Nightjar, or various trees and plants. If the USACE can determine that sand sources in the ocean or nearby rivers are not contributing to habitat sustainability, then there would be viability with borrowing from those sources. These still would require environmental assessment of both borrowing the sand and activities to transport sand through habitats as well. USFWS and NMFS also recommended a couple sites to investigate for potential aquatic sand sources: Arecibo River mouth - dredge and stockpile; Aguadilla Break Water – dredge out sand stopped by breakwater.
7. Due Outs
 - a. USACE will review materials from last iteration of the study and coordinate with NMFS and USFWS to make recommendations to establish exactly where in the consultation process the Study Restart now sits, and what work needs to be done.
 - b. USACE will develop design criteria for the placement of sand material for nourishment, dunes, or other. NMFS and USFWS will provide information on species/habitat need in terms of sandy materials for USACE to utilize in the development of criteria.
 - c. Once alternatives become more developed and preliminary results from environmental surveys are provided, USACE will meet with NMFS and USFWS to discuss needs for mitigation. The development of a resulting Mitigation, Monitoring & Adaptive Management Plan would be collaborative to ensure both USACE and regulatory agency components are being met.
8. The POC is Frank Veraldi (312.846.5589).



FRANK VERALDI (CELRD)
Regional Technical Specialist
Ecosystem Restoration Formulation

APPENDIX H – PERTINENT CORRESPONDENCE

ATTACHMENT 3 – COMMENTS & RESPONSES – DRAFT REPORT NOVEMBER 2020

A Draft Integrated Feasibility Report and Environmental Assessment was released for Public Review on November 20, 2020. The review period concluded on January 6, 2021. A total of 185 formal comments were received during this review. Due to the level of concern and opposition for the proposed plans, in conjunction with the need to perform additional analyses, including environmental surveys, the team had to extend the timeline for the study. Ultimately, the additional analyses, evaluation of the review comments and through further coordination, the tentatively selected plan (TSP) has changed. The new TSP plan has support from the Governor of Puerto Rico, the Secretary of DNER, and the USACE. As this TSP is significantly different than the plan presented in the Draft Report in November 2020, the revised Draft Report must undergo an additional public review. The review and comment period for this draft report is June 12 - July 12, 2023. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico during the last week of June 2023. All comments received during the Draft Report open comment period will be published with responses in the Final Report.

Number	Commenter	Comment	Corps Response
1	<div>Maritza Barreto, PhD Professional Geologist</div> <div>Dec, 8,2020</div>	<p>I would like to share with you some comments of the draft of the Puerto Rico Coastal Study, specifically Section 2.3. Physical Environment and 2.3.1 Shoreline Change and erosion rates and Appendix A, section 3.2 Shoreline Change Rates.</p> <p>My main comment is related with the source of information used as a database for develop the shoreline change rate analysis of the Puerto Rico Coastal Study. Specifically, I do not understand how the shoreline changes databank prepared by Deltares for the period 1984-2016 was used.</p> <p>The Deltares project showed a very good approach for assessing the long-term condition in a worldwide coastal change level but it showed a constraint in evaluating island ‘system scenarios. The use of transect intervals of 500 meters to evaluate accretion and erosion state could cause important changes occurring on the shoreline to be missed. I understand that it is very difficult to identify shoreline change data because in many cases it is not available.</p> <p>The Coastal Research and Planning Institute of Puerto Rico (CoRePI) is conducting a study of Post Maria Beach assessment for all Puerto Rico municipalities for the period of March 2017 to March 2018 using high resolution aerial images. This Project is supported by FEMA. Currently, we completed the assessment of San Juan, Rincon, Aguadilla, Arecibo, Barceloneta, Humacao, Arroyo, Añasco, Aguada and Loíza (10 meters transect). Included is a link of our webmap that showed the accretion/erosion findings for 10 municipalities .</p> <p>https://storymaps.arcgis.com/stories/dfb5b1a22af6440b809cde3aac482b42?fbclid=IwAR2zL3lVnHSbAVFml33zeyQk1fYulO1Dm_F3uwUznlalGdF079sXjaQCgvo</p> <p>We developed a geospatial databank that includes beach width (m) changes (March 2017 vs September 2017; September 2017 vs March 2018). Also, we have the shoreline feature class for San Juan and Rincon municipalities (March 2017; September 2018; March 2017).</p>	<p>PRIMARY CONCERN: Shoreline Change rate analysis</p> <p>Previous and ongoing work from Dr. Barreto and UPR were considered when developing long-term erosion rates for the study area(s). Physical data from short-term and event-based erosion (i.e. the post-Maria data that was partially conveyed in the document Dr. Barreto sent on 07 December 2020) aren’t directly considered in the long-term erosion data that are required in the planning modeling efforts (Beach-fx). However, these data are still indirectly considered to verify erosion from specific notable storms (i.e. Hurricane Maria) that the cross-shore change model (CSHORE in this case) estimates for hundreds of events at each profile within the modeling domain.</p> <p>Many data sources were considered in 2019 when these long-term erosion data were required for the modeling efforts in this study. These sources include, but are not limited to, the following: Google Earth, Deltares, work from Thieler/USGS, periodic LiDAR from FEMA/USACE, DNER data and records including imagery as early as the 1930s and data that went into costavispr.org, published UPR documentation, and published documentation and data from Dr. Barreto (some via internet searches and others via work with Dr. Legault). Weighted averages from some of these source data (with data periods greater than ~10 years) made up the long-term erosion at each modeling profile in each focus area. It is important to note that major event-based erosion far outweighs the long-term, or “background,” erosion in Puerto Rico (and specifically in the San Juan beaches from El Boqueron to Boca de Cangrejos). Both the long-term and CSHORE-estimated short-term erosion rates are combined to add up to a final annualized erosion rate at each profile during the Monte Carlo life-cycle model simulations.</p>
2	<div>Thomas Zemaitis</div> <div>Dec 9, 2020</div>	<p>My name is Thomas Zemaitis. I am a property owner in the Rincon, PR township Corcega coastal area (Area B, on your map). I have been an owner of property in Rincon for about 36 years, and I have seen the changes all along the Rincon coast. As you know, the rising ocean water and waves have devastated our shoreline.</p> <p>You are suggesting “Revetment” for the Rincon/Corcega” shoreline. From what I know, Revetment is basically stones piled-up along the shore. While this may help, it will not bring back the beach sand, and may even make any sand disappear entirely.</p>	<p>PRIMARY CONCERN: Revetments in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them.</p>


Number	Commenter	Comment	Corps Response
		<p>What might be more effective would be some sort of offshore breakwater. Such a structure would break the waves, create a calm area of water between the shore and the breakwater, and if designed properly, help bring back our beach sand.</p> <p>Below are 2 photo examples. Many more photo examples online - just search for “offshore breakwater”. I am sure you know about these structures.</p> <p>My property is directly on the Corcega beach. When the waves and winds come from the north, some sand starts to accumulate along our shoreline. When the waves and winds come from the south, any sand on the shore disappears. I have seen this for many years. Maybe you should consider this during your study?</p> <p>In the past couple years since hurricane Maria, a large amount of sand has accumulated at the beach in the Rincon Pueblo town area (sometimes called “Lala Beach”). Maybe this is the sand from our Corcega area?</p> <div><div><p>3. Breakwaters (hard engineering)</p><p><u>How does it work?</u></p><ul style="list-style-type: none">Constructed offshore, breakwaters create a zone of calm water behind them.A shallow zone of water is created between itself and the coast.</div></div> 	
3	Jose Ubinas Dec 28, 2020	<p>I just wanted to comment on the proposal to put a breakwater and refill sand on beaches in Puerto Rico.</p> <p>Puerto Rico has a "land-and-sea" protected area where you are not supposed to build anything. This area is not respected in any way, shape, or form. As long as building continues along this 1,000 foot line that's supposed to exist between the average ocean line and the nearest building - the problems will persist. Any attempt to fix what is already a broken shoreline should come with the requirement that the land and sea protected areas are respected and enforced. If not you are just punting the ball 50 years because the problem won't get any better.</p> <p>Also - if you want to build a breakwater in Rincon, consider that Rincon is the premier surfing destination in Puerto Rico, and one of the best in the world. Warm waters, big waves, plenty of places to stay. If you build a breakwater, just understand that the Rincon public beach, and all that beach near Corcega, is a place where surfing lessons are easily provided as there's a deep water long break which makes it very easy to teach. Just be mindful. Rincon is first and foremost a surfing destination. Any development that tries to turn it into anything other than a surfing town is going to ruin the entire reason for it existing.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. Breakwaters are not being proposed due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them.</p>
4	Andres Romeu Dec 28, 2020	<p>I missed the conference call on the feasibility study for Rincon held in the last couple of weeks and was wondering if I could get a link to the draft feasibility study discussed in the conference call and in today's press.</p>	<p>PRIMARY CONCERN: Requesting information</p> <p>Thanks for your message. All the documents are posted on the study website: https://www.saj.usace.army.mil/PuertoRicoCSRMFfeasibilityStudy/</p> <p>Look at the right-side Tab with the Downloadable Resources.</p>

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
5	Luis Melendez Dec 28, 2020	<p>I just learned about the projects for the beaches in Ocean Park and RINCON, PR, and am really concerned on how will that affect my property.</p> <p>I own an apartment in RINCON Beach Resort, and would like to know what are the plans with that beach, which could affect the value of my property.</p> <p>Is there any plans, drawings, or anything I could look at, that will give me an idea of the finished “product”? Are we losing our beach? I would appreciate your response.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thanks for your message. All the documents are posted on the study website: https://www.saj.usace.army.mil/PuertoRicoCSRMFfeasibilityStudy/</p> <p>Look at the right-side Tab with the Downloadable Resources.</p>
6	Elena Barquet Dec 28, 2020	<p>Dear person reading emails that will impact my country for generations to come,</p> <p>Please use sand and not rocks to deal with the erosion in Rincón and Condado. It’s more expensive but it’s also the correct thing to do.</p> <p>Protect our beaches for the long haul, not just the buildings that should have never been built there.</p> <p>More sandy beaches, as is our true nature, will also help retain property values.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p>
7	Felix Lopes Dec 28, 2020	<p>I’m writing regarding the Puerto Rico Coastal Study and to make some question about some doubts we have related to the surfing and tourism industry. We are worry about how the proposal will assure the current waves will continue to provide the same level and consistency we have today.</p> <p>Also Rincon today’s have a good economy that has grow in the las 30 years related to the surfing. And affecting the waves we understand will not only affect a sport and people lifestyle but also will affect economic, affecting the prices of property and tourism.</p> <p>We are very worry about to provide rock over the costal line cause similar projects in Aguadilla haven’t been successful protect the waves around the project area. What alternate to rock are being evaluated?</p> <p>Also... what other effort can be done to include other areas affected by the costal erosion like crash boat area, Islote - Arecibo among others.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon.</p> <p>Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>
8	Waleska Ramirez Dec 28, 2020	<p>The excessive development at the coastline of Rincón, PR has been critical and detrimental over the last 3 decades allowing construction at the coastal zone that should have been protected, allocating funds in order to solve infrastructure problems that should never have been located on the coast. Corps of Engineers let's save the beaches of our island for the enjoyment of all, especially with federal funds that come from the taxpayers money, and not the excessive construction on the coasts of the beautiful municipality of Rincón Puerto Rico. The coastline should have been protected for the enjoyment of all.</p> <p>Today I ask the Corps of Engineers what measures will be established to stop the excessive construction, to prevent this from happening again, not only in Rincón but across the island 100 miles x 35 miles. What safeguarding measures will be implemented to prevent this from happening again and again. Will there be rules established to prevent money and corruption from allowing these constructions, to then cry out for help and have monumental sums allocated to save properties that should not have been built in the aforementioned coastline areas. It seems like a perfect opportunity with this monumental assignment of funds to incorporate the protection of coastlines on this project specifically in Rincón where the growth it’s been exponential over the last 3 decades and not paired with the municipal infrastructure development (that is another subject where higher altitude rural areas lack of potable water for days).</p> <p>Coasts are living areas that naturally change with currents and natural and atmospheric events. Include rules and regulations to delineate significant buffer zones to prevent and protect what remains of the coasts of Rincón and the beautiful island of Puerto Rico.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon.</p> <p>Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline that will support the local and regional economy.</p>

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
		In addition the coastline of Rincón is not abundant this project will have negative impact on tourism limiting access to what was before a sandy beach. Tourism is the main income of the municipality. I also have my concerns with the environmental and biological impact on the fragile marine ecosystem of Rincón which I enjoyed so much in my childhood and early adulthood as a native Rincoeña.	
9	Zenaida Fernandez and Emely Fernandez Dec 28, 2020	<p>This is to express my opposition to the project to protect San Juan and Rincón coastal infrastructure. As reported by the Center of Investigative Journalism[1] (CPI in Spanish), recognized scholars in Puerto Rico have expressed that even though the project is intended to protect properties and infrastructure in San Juan and Rincón, it will have an adverse effect on the erosion of the coast and negatively impact tourism.</p> <p>As per Miguel Canals Silander and Aurelio Mercado both oceanography experts from the University of Puerto Rico in Mayaguez, and Maritza Barreto from the Research Institute for Coastal Planning in Puerto Rico, this project is critical and should have more promotion and analysis. As reported by the CPI, experts interviewed criticize that “the selection of the coastal areas for the mitigation projects is based only of economic aspects, without considering human and social variables.” Even though federal funds will support the project, it is uncertain how the Government of Puerto Rico will finance its part amid a bankrupt and dismantling of public agencies. The experts agree that it is inadequate to replace sand beaches with rocks using data from 2016. It seems that this project is intended to protect the infrastructure of construction that should have never been authorized in the first place due to its nearness to the coast.</p> <p>Puerto Rico deserves the protection of its coasts to save the region’s flora and fauna. Decisions should consider all Puertorricans and have adequate planning. I urge the USACE to reconsider this project and allocate more time and resources to analyze current data and the opinion of local experts.</p>	<p>PRIMARY CONCERN: TSP</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>
10	Anna Posada Dec 28, 2020	I do not understand much of construction, and I didn’t see where this revetment would be constructed in Rincon. However, I wanted to say that it should be constructed along the beach in the neighborhood of Stella. In Puntas beach, the reefs protect the coastline and we cannot afford to have any structures that damage the waves, since surfing is one of our major tourist attractions. However, the properties along barrio Stella’s coastline suffer from rising tides and waves, since there isn’t a reef to protect the coastline.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline that will support the local and regional economy.</p>
11	Jaris M Delgado Dec 28, 2020	<p>I am Jaris Delgado a person who lived all my life in Rincón PR. I am a Clinical Psychologist and a leader of the community and loving human of the Nature that is our gift from God himself for us to take care and enjoy all together in Harmony.</p> <p>Many people in Rincon and other towns are concerned about the impact of this project in the economy, and most important with the EXTREMELY FRAGILE conditions that our coasts in PR are and suscepibility for exploitation. https://periodismoinvestigativo.com/2020/12/rincon-podria-perder-su-playa-debido-a-un-proyecto-federal-que-busca-proteger-la-infraestructura-de-la-zona/</p> <p>Look at a picture that I took random a week ago, I didn’t knew about this place and people told me there are few more like this in Aguada, Rincon, and Condado PR.</p> <p>Please, We wish to protect the Nature and to support the members of our local communities in PR who are mostly struggling with economical and socio political oppressions to survive.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p>

Number	Commenter	Comment	Corps Response
		<p>Help us to love and protect more our coast and all our Earth. Please take care of this situation with love.</p> <p>Thanks and Please Hear us!</p> 	<p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>
12	Pedro Martinez Dec 28, 2020	<p>I just read on the news about the proposed project to mitigate coastal erosion in Rincón, PR.</p> <ol style="list-style-type: none">1. Can you provide the link to the proposal open for commentary/ feedback?2. Does the proposal for Rincón cover the coast bordering the Rincón Beach Resort area?	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.</p>
13	Leunan Melendez Dec 28, 2020	<p>How will this affect the marine environment, including corals, fauna, flora and swell? Currently there is no law to prevent further construction on the coasts, but they want to try to tame the sea so that it does not enter. Does this sound logical/ecological?</p>	<p>PRIMARY CONCERN: TSP</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>
14	Denise Nieves Dec 28, 2020	<p>I am a 35 years old, environmental Technician from Rincon, P.R</p>	<p>PRIMARY CONCERN: TSP in Rincon</p>

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		<p>I am extremely concerned with the decision of extraction of sand and the addition of rocks in the coast of Rincon.</p> <p>Rincon has a big diversity of marine animals (Wales, turtles as the tinglar that is an endangered species) that each year they come to Bo. Puntas and travel around our coast. Rincon also is a touristic area mainly because of the surfing and snorkeling, crystalline waters. If the primary source is affected nobody will want to spend money in a really small town, with water, drug addiction, sedimentation problems.</p> <p>Please, when will the public audiences will be held in Rincon? We need to know more about these bad ideas that won't work. In the balneario of Rincon area a project was carried out about 25 years ago where stone walls of more than 10 fts Height were created which are now buried under sand. Homes can be important, but life is more important!!</p>	<p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico. Details and updates can be found on the website: https://www.saj.usace.army.mil/PuertoRicoCSRMEasibilityStudy/</p>
15	Zulma Balasquide Dec 29, 2020	<p>I have a few questions</p> <p>1.are the beach going to be protected in a form that people can still use the for surfing and swim?</p> <p>2What will be the distance from the shore to the barrier that will be place?</p> <p>3How the marine life will be impacted with this project?</p> <p>4Have to take in consideration how this project will impact the tourist industry in the zone?</p> <p>5 Are they going to be public hearings related to the project?</p> <p>6 Where we can find more details?</p> <p>7Are you doing an information campaign for the public?</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico. Details and updates can be found on the website: https://www.saj.usace.army.mil/PuertoRicoCSRMEasibilityStudy/</p>
16	Angeline C.F Dec 29, 2020	<p><u>Preventing erosion using natural resources</u> Why not apply different types of agronomic methods to control the soil erosion with a good strategic planting the same can help to safeguard the sand and ensure that it is not carried off in erosion. It can be added a design integrating this idea to attract tourists as well as educating the population about the environment. What if we do a competition using the universities and colleges of Puerto Rico in which they would have to use natural resources or invent new methods or ideas that will be effective for the economy and converted into a tourist attraction in which we would create to educate about this problem also is going to bring recognition to the island. I am sure this will help create a relationship between the people and the government. We have the social networks and well educate people why we do not try that first before expending a ton of money that is going to be effective probably for an interval time not forever also is going to depreciate the value of the place. We can use famous people to promote competition. Please let me know for anything!</p>	<p>PRIMARY CONCERN: TSP</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>Additionally, the proposal for Rincon has a native vegetation component.</p>
17	Steve Torres Dec 29, 2020	<p>I live in that area you are attempting to dump rocks onto.</p> <p>1. I would like to know if you have a map that shows the specific areas you are talking about placing those rocks into. I have read an article where it states between Corcega resort and Los Ramos Stream. Nowhere does any map I have found show a Los Ramos Stream.</p> <p>2. How does that project effect the endangered sea turtles that use those beaches for laying eggs?</p> <p>3. Would replacing sand be a better option for the economy of those you are trying to "save" than the losses you are claiming? Any thoughts put into building an artificial reef barrier to slow down the erosion?</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.</p> <p>A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental</p>

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			<p>resources. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico during the last week of March 2023.</p>
18	Frank Inserni Dec 30, 2020	<p>I share some thoughts on your study and suggestions:</p> <p>1. Mitigation of increased erosion on the north, east, and west coasts of PR should be combated with:</p> <p>a) detached and submerged breakwaters offshore to reduce the energy of the incoming storms and hurricane storm surges.</p> <p>b) the formation of protected sand dunes created by nourishing the beach section and planting on the dunes. (the University of Puerto Rico in Aguadilla has a project of restoration of dunes that is the model for this protective measure. throughout the 60's, 70.s and 80.s major dunes of the north coast were destroyed by developers extracting sand for making cement which has unfortunately been the basis for the destruction of the north shore beaches in many sections.</p> <p>c) The USACE's permitting process for proposed breakwaters should be reviewed so as to fast track any project proposals in light of increased hurricane activity.</p> <p>d) Funding should be appropriated for the removal of dilapidated structures on all three major coasts (east, west, and north like Rincon, Vega Baja, Vacia Talega (Loiza), Luquillo, Yabucoa, Palmas del Mar, Fajardo, Arecibo, Isabela, Manati, and others) with the absolute prohibition of rebuilding on a scientifically established no-build zone based on projections of storm high tides and extreme storm surges.</p> <p>e) Revision of the local regulations (PR Planning Board, PR DNER) establishing the maritime-terrestrial limits so as to avoid any developments such as those seen in demolished large apartment complexes in Rincon built too near the coast.</p> <p>2. Revetments and walls will only worsen the erosion down the road and will eliminate any possibilities of restoring beach areas. The backwash effect of waves hitting walls and revetments will eventually further erode the base of such structures and eat into the properties being artificially protected. (See Calle Almendro in Punta las Marias as an example.</p> <p>3. Beach nourishment is a waste of money and time if you do not reduce the wave energy.</p> <p>4. The north coast's outer reef along Loiza, Luquillo, Isla Verde, Ocean Park, Condado, and San Juan is not a real barrier to excessive wave energy hitting such coastline to allow for beach restoration. Submerged breakwaters/artificial reefs with heavy 6-8 ton boulders available in various PR quarries properly designed and placed will lower the wave energy needed for long-range beach nourishment to prevail.</p> <p>Worldwide breakwaters/artificial reefs placed horizontally in front of endangered shorelines have been successful in preserving beach sections very important for recreation and the economic impact of tourism,</p>	<p>PRIMARY CONCERN: TSP</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.</p> <p>A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features.</p> <p>We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico during the last week of March 2023.</p>


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		<p>particularly in tropical areas such as PR in which people living in cold climates from all over the world come to seek the sun and warm weather and clear water.</p> <p>I enclose some examples of such parallel breakwaters well known to the USACE, particularly one in Bayou La Batre in Alabama.</p>	
19	Gwen Black Dec 30, 2020	In response to Determine Federal Interest and recommend a plan for storm damage reduction to properties and infrastructure along specific coastal areas in PR. I submit no! Rock revetment is not good for beach access; there will be no sand. Do not let rocks be placed on beaches.	<p>PRIMARY CONCERN: Revetments</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline.</p>
20	Michael Pawel Dec 30, 2020	<p>The proposal to construct a revetment along the Rincón coast would be costly and economically as well as environmentally disastrous. The open beach is a core feature of the town; it has been gradually regenerating since the hurricane and is now again a popular resource for the community and a central attraction for tourists even despite the pandemic. A berm and beach nourishment might be a significant improvement, but at present the beach requires no immediate intervention at least north of Calle 11 in Stella. South of that point, some sort of intervention might be beneficial to a few property owners directly on the coast, but even there a revetment or breakwaters that would effectively destroy seafront recreation would represent an irreparable environmental and probably economic loss--at a high cost.</p> <p>In the midst of Puerto Rico's current economic crisis, this project proposal is completely inappropriate. The most sensible course would be to simply abandon it.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline.</p>
21	Priscila Ramirez Jan 1, 2021	<p>I do not know if this would reach anyone, but I will try to plant a reasonable petition. My family has an apartment in the condominium Victoria del Mar, Rincon, Puerto Rico. When they originally bought the apartment, the beach had miles of sand. So much so, that you would walk to the beach, there would be beach volleyball nets, and after people in chairs and then the water. Throughout the years, the levels of water have risen, and the sand disappears. As you know, Maria destroyed much of the Island, and the coasts of Rincon were not excepted. They suffered much destruction and finalized the erosion of beaches at the coast. A place where lots of Puerto Rican families have apartments where they would enjoy vacations and weekends with their families, at the same time, boosting Rincon's economy.</p> <p>Rincon is a tourist municipality. Its economy mostly runs on visitors, either locally or internationally to come to the beaches of Rincon for the surf and the beautiful nature it offers, including its beaches.</p> <p>I understand that something needs to be done to limit and stop the continues erosion and damages to property. But, lets do this the smart way, something that not only remedies an issue, but also serves for the continued growth of the economy of Rincon, and at the same time, Puerto Rico.</p> <p>If rocks need to be placed, it does not make sense to place them at the coast! You will be killing part of the attraction of Rincon and devaluing properties. Why not place them a little farther away, so as to</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline.</p>



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		<p>maintain a little beach, “posita”, which would make a calmer beach. Something similar as to what was made in Dorado Beach, Puerto Rico — a place where now millions go and have boomed the market of Dorado! A few yards away, would not kill the beach, and I believe would attain the protection you are seeking.</p> <p>Lets do this, I am all for it, but lets do it intelligently! Do not kill part of Rincon’s charm and attraction but make it better!</p> <p>I hope a smart decision is made for the people of Rincon. Trully!</p>	
22	Jazmin Diaz Jan 3, 2021	<p>As a landscape architect I urge you to:</p> <p>1. Extend the date for commenting- 30 more days to evaluate the Rincon alternatives 2. I visit corcega beach frequently and know the situation, it should be treated very carefully, a few structures, are basically being sunken, it’s a sensitive area and rich ecosystem.</p> <p>3. The economy of Rincon depends a lot on the beaches and the surfing- please dont just put rip rap, that will stop the natural processes, the little coast left in Corcega will be lost.</p> <p>PLEASE EXTEND THE COMMENTING PERIOD- give us at least 30 more days.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
23	A.Gonzalez Jan 3, 2021	<p>Having walked the Rincon coastline before and after Hurricane Maria, I have seen the constant changes. Houses in Stella area the dumped rocks there is no sand deposit and the beach is lost forever. In the other hand properties and lots acrosss the coastline in Stella Rincon that left the area natural (no rocks dumped) their sand is the beach is growing slowly.</p> <p>I am available to show you the areas I am talking about. Feel free to contact me if you need this valuable information. <i>Environmental Scientist (Trespalmas)</i></p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline.</p> <p>Additionally, the proposal for Rincon has a native vegetation component.</p>
24	Jose Sanchez Jan 3, 2021	<p>I’d like to start wishing you and your families a very blessed and healthy new year 2021.</p> <p>My name is Jose Sanchez, engineering is a passion for me and my family.</p> <p>I go to Rincon Several times a year for local tourism because of the precious beaches.</p> <p>I know you are great engineers and most important great people, that is why I was motivated to write to you. Please, there must be a more ingenious and better solutions than a wall of rocks that will turn the beaches in the area into deep water and will result in the vanishing of the sand and beaches. On top of that, it will create an economical deficit to many local shops, restaurants and businesses in Rincon.</p> <p>I hope you can resolve a solution that will benefit everybody, but primarily the nature and the community.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan for Rincon will restore the sandy shoreline.</p> <p>Additionally, the proposal for Rincon has a native vegetation component.</p>
25	Graciela Eleta Jan 3, 2021	<p>We support building a man-made rock reef/ barrier as well as adding more sand to Playa Corcega and other affected areas.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources</p>

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26	Margarita Torres Jan 3, 2021	Hi: My sincere and respected opinion. There could be options to resolve the problems and not interfere with the nature geography structure of the Island. If is good to the capital of San Juan a combination of the 3 options, that's the correct options for the whole Island. Our beaches are not only why the Island is called a paradise, it happens that those coasts are also an income source for towns and small business. Used the options that sum alternatives and beauty to the coast, not that option that is less expensive but could be a geological and economic disaster. Thank you.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline and the tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain. Additionally, the proposal for Rincon has a native vegetation component.
27	Luz Vargas Jan 3, 2021	I strongly oppose the proposed USACE plan to protect the coast of Rincon with rock revetment. A solution that also preserves the beaches needs to be presented, in order to protect the economic and social future of the town.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
28	Wanda Torres Jan 3, 2021	I strongly oppose the proposed USACE plan to protect the coast of Rincon with rock revetment. A solution that also preserves the beaches needs to be presented, in order to protect the economic and social future of the town.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

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29	Luis Sierra Jan 3, 2021	<p>We are kindly requesting your attention to the erosion occurring in Isla Verde as shown below. The PR Department of Natural Resources have identified this area as an emergency situation, but their approach has been that each individual provided the resources and permitting to manage the emergency that affect miles of coast.</p> <p>Enclosed are the permit that due to their multiple interagency permits approvals requirements make them impossible or practical to obtain by an individual. Each individual will then need to deal with private organizations (that do not live on the coast) that paralyze such activities.</p> <p>We are requesting that the coastal study include the Isla Verde area shown below. The USACE issued a Nation-Wide Permit Number 13 for this sector 14 years ago. PDFs attached to email (permit is in Spanish).</p> <p>Isla Verde Lat 18°26'57.17"N Lon 66° 2'9.96"W</p> 	<p>PRIMARY CONCERN: Isla Verde</p> <p>Thank you for your comment. Early modeling of Isla Verde planning reach indicated minimal erosion, with natural beach recovery after storms and seasonal shift, resulting in very low damages to structures. After careful consideration and support by the non-Federal sponsor, due to this low risk, this planning reach was not carried forward for further analysis. Moreover, a portion of the actual Isla Verde community was included in the Ocean Park planning reach (R15 to R11) due to the nature of coastal flooding that overlaps in these communities. Therefore, coastal flooding problems in Isla Verde are reduced with the proposed tentatively selected plan within the Ocean Park planning reach. Notably, the image referred to below is included in the tentatively selected plan, where a seawall is proposed adjacent and to the west of the areas shown. The seawall would serve the primary function of reducing coastal flooding damages within the San Juan Metro area and would also provide stability to the shoreline. Behind the seawall, sand would be placed. This area would be owned by the San Juan Municipality and could be potentially used for public recreation.</p>
30	Mitchell Rapoport Jan 3, 2021	<p>I read with alarm about your drastic proposal to eliminate beach erosion by, in effect, eliminating our beaches through stone revetments. Please reconsider doing anything that would negatively affect our beautiful beaches, which are the lifeblood of our economy and one of the main reasons many of us live here. That would be a disaster for our beloved Rincon and, in turn, for Puerto Rico.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
31	Milagros Cruz Jan 3, 2021	<p>We hope you consider other alternatives to solve the erosion problems in Rincon. Something different that won't eliminate the beach.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon</p>

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			will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
32	Rosana Rosario Jan 3, 2021	I have a property in Rincon and I request to look other alternatives to solve the problem. The alternatives suggested will affect Rincon economy.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
33	Alina Rionda Jan 3, 2021	Why don't you demolish all the damaged buildings no used, and clean all the debris to nourish the beach with sand? If waters are too deep you could slope the beach down.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
34	Andres Romeu Jan 3, 2021	<p>Like many others in Rincón these days, I object to the conclusion that the Puerto Rico Coastal Study - Rincón study has arrived at, whereby the only feasible solution to erosion problems in Rincón is a stone revetment of 5,650 ft along the Rincon shoreline. In my mind, this amounts to giving up on any possibilities of solving the erosion problem, where the situation has hardly been studied. Such a simplistic solution presumably protects the properties beyond the beach, but a healthy beach system also protects the properties beyond the beach. It goes without saying that by protecting the properties beyond the beach with a stone revetment to cover the beaches that still remain, the entire concept of our beaches as the magnet for thousands of tourists that visit our town would fall by the wayside quickly. The impact on Rincon's economy of this is predictable...</p> <p>It also shows lack of study, and therefore of understanding, of the many factors at play. Being a resident of Rincón for twenty years and a PhD oceanographer, I have been observing the system for much of that time. It is apparent that some key factors have not been considered in the equation that results in a mile-long stone revetment along our most popular beaches.</p> <p>Quebrada Los Ramos was a low-volume creek, like many others around our shores, which was canalized in the early 90's in a project sponsored by the Corps of Engineers and the central government, in an effort to control flooding in some of our neighborhoods. A good project for sure, but with unintended and unexpected consequences. The following image shows a part of the extent of the canalized creek. The sand plug of the seaward side of the canal separates the sea from the fresh water in the canal beyond, whose water level rises continuously during the rainy season. As the water in the canal reaches</p>	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The study team believes that the impact of the canal is relatively small and localized. The large-scale erosion problem likely stems from many factors, but the largest are likely the continued harvesting of sand from the beach, dunes and rivers (over decades), coastal development and coastal armoring. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component.

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		<p>the top of the sand berm, it breaks through, and carries the sand previously in the berm out to sea in a fairly violent and dynamic stream of dirty water. A video taken of such an event (https://drive.google.com/file/d/1xIJQ76p2rs5wfUOsLoKT7_O3Yy0IOQN4/view?usp=sharing) clearly illustrates this.</p> <p>Before and after images of such an event shows the impact of such an event, which can happen several times during any given rainy season.</p> <p>In all cases, the berm is filled in after a few days, and the cycle repeats itself. These images leave many questions unanswered. Where does the sand in the washed out berm go? Is it deposited close to the shore, to be moved back to the beach again, or does it move far enough offshore to not be affected by the action of the waves and currents? It is important to note that the rainy season is during the summer/fall, during which time wave action is barely significant in Rincón.</p> <p>Bajo Blanco is a sand flat/bar approximately 350 m from the shoreline at Rincón’s balneario (public beach). The sand bar can be clearly seen in the image below, along with its close proximity to Quebrada Los Ramos. One has to wonder... is the sand flat at Bajo Blanco growing as a result of the sand berm blowouts that are often seen at the canalized creek? In the absence of any complete studies of the littoral system, we will never know.</p> <p>In any case, the Bajo Blanco is approximately 350 m from the shoreline at the balneario, hardly a significant distance when one considers how far away dredges have to operate from Florida’s coasts to renourish their beaches.</p> <p>This canalized creek is the most dynamic system in Rincón’s shoreline at this moment, appears to be a likely culprit of the erosion problem, and its removal from the equation can be easily accomplished by installing a deep drainage tube under the sand to keep its water level below the top of the sand berm. One would venture to guess that accomplishing that and renourishing the beaches from the Bajo Blanco sand flat would accomplish a lot more benefit for the cost and might even cost less than a mile-long by fifty feet stone revetment, installed.</p> <p>Thank you for allowing us to comment on this matter. It is my sincere belief that we can come up with a better solution than the stone revetment proposed.</p> <p>Photos from Quebrada Los Ramos.</p> <div></div>	

Number	Commenter	Comment	Corps Response
		<div></div> <div></div> <div></div> <div></div> <div></div>	
35	Joseph Bonilla Jan 3, 2021	Receive a cordial greeting, I am a resident of the municipality of Rincón 31 years ago. My people have been going through different changes at the level of such economic, social and tourist level. With this, our people experienced an unmeasured construction development of building off our coast. Which gradually caused our shores to disappear. It is important to address this situation urgently. Recently, the media	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in

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		published that the U.S. Corps of Engineers approved a project to prevent erosion. However local expert from the municipality of Rincón points out that the approved measure of laying stones is not feasible; because, it would cause irreparable damage and we would lose the whole coast. Therefore, we ask that you meet with the community for viable measures and solutions for our people. Thank you	Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
36	PJ Nam Jan 3, 2021	We are against the Corp of Engineers to establish a rock wall in this coastal area, without sand our beautiful beach will disappear, our local economic is based in tourism coming to enjoy the area and the beachfront. Please, listen to our local scientific about this important issue.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
37	Greg Brown Jan 3, 2021	Please allow the beaches to remain beaches. This is important to our community, commerce and our development. Thanks	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
38	Roberto Ruiz Jan 3, 2021	I Roberto Ruiz, recognize the serious problem of coastal erosion in my town Rincon. But I oppose the proposed plan to fill the beaches with stones. I humbly ask you to look for other alternatives to save our beaches and our RINCON people. Thank you for your attention.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
39	Malu Muniz Jan 3, 2021	We understand that the solution of covering with stones a mile of beach in Rincon will negatively impact the economic and social development of our people. Access to beaches for swimmers is our main tourist attraction and we must preserve it. We understand that the problem of coastal erosion in Rincon is serious, so it still requires technical, social and economic studies. Possibly a plan similar to the proposed one for Ocean Park, which integrates breakwaters and preserves the beaches, should be considered.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern

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			regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
40	Win Ritzert Jan 3, 2021	<p>The proposed erosion mitigation plan for Rincon must be re-thought. It seems to only consider property values as a rationale for basically sacrificing beaches in order to stop erosion. Ironically, the value of "beachfront" properties would diminish considerably once there is no beach. It doesn't appear that the data supporting this project is either current or complete. There needs to be an up to date environmental impact study reflecting conditions as they exist in 2021 and the impact this project would have on marine flora and fauna, quality of life and beach preservation. This is, as we used to say when I was in the marine construction business, a "quick and dirty" solution, likely to cause many more problems down the road than it solves short term.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
41	Brenda Bromley Jan 3, 2021	<p>My husband and I visited Puerto Rico 10 years ago and recognized what this island had to offer; so much so, that we decided to move to Rincon in 2013. Because of our experience, we felt compelled to respond to the contemplated beach renourishment projects for Rincon and San Juan.</p> <p>The Puerto Rican Government should heed the warnings you are receiving from your own academia and environmental leaders. These experts recognize what <i>WILL</i> happen to the existing beaches if man interferes with Mother Nature. One only needs to look to coastal Florida to understand what adding sea walls, rock jetties, stone cladding, etc. does to the natural ebb and flow of water and sand.</p> <p>Prior to moving to PR, we lived on the Gulf coast of St. Pete Beach, Florida for 27 years. During that time, our public beach was renourished on three different occasions costing millions of dollars each time. Funding was similar to what is being proposed for PR – part funded by the Federal Government; the balance funded by the local Government. The local funds used for beach renourishment could have been used to improve our community in so many other meaningful ways. And, since renourishment was done three different times, it proves renourishment is not a sustainable option long term even when adding man-made barriers.</p> <p>The situation here in Rincon today is identical to what we witnessed on St. Pete Beach regarding beach erosion. The erosion in St. Pete Beach occurred as a direct result of building sea walls and rock jetties to protect beach property in the 70's and 80's, similar to what the Corp of Engineers is proposing for the Corcega beach area in Rincon. This erosion was exacerbated over a period of several years by multiple storms. These sea walls and jetties changed the way the water naturally moved the sand causing serious erosion issues <i>both up and down</i> the beach. The beach is meant to ebb and flow with Mother Nature; its intent is to naturally protect property well away from the mean high tide level.</p> <p>Rincon survives on tourism – so does St. Pete Beach and the beaches is the asset that tourists come to enjoy. By choosing to protect 5,600 feet of beach for <i>private</i> property owners, the Government is compromising the livelihood and economic base of our entire area.</p> <p>The fairest, potentially least expensive way to resolve the situation: Allow the property owners to recover any money from insurance they are entitled to</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

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		<p>Determine a fair value for the properties</p> <p>The Puerto Rican Government should declare “eminent domain” for the area and purchase the property from the owners at fair value</p> <p>PR Government determine what to do with the unsafe structures – demolish and remove, or leave in place</p> <p>Option for removal: Implement beach stabilization by establishing a system of dunes and beach plantings that hold the sand in place naturally</p> <p>Implement coastal building codes that do not allow any residential or commercial structure to be built at mean sea level within so many feet of the ocean’s mean high tide level</p> <p>We owned property on St. Pete Beach that was built in 1956. The residence was at mean sea level. Had our home been destroyed by a storm, we would not have been allowed to rebuild at sea level. A new structure would have had to be built at a minimum of 12 feet above mean sea level. Had our property been located beach side as the Corcega properties are – we would have only been allowed to rebuild several hundred feet back from the “high tide” beach level and at a minimum of 12 foot above mean sea level.</p> <p>We urge Puerto Rico to reconsider its plans for beach renourishment. Saving a few properties today will certainly endanger several other properties in the future and in the end destroy a way of life for the community of Rincon.</p>	
42	Victor Rosado Jan 3, 2021	I object. The most important economic activity in the Rincon area is surfing tourism. So far there has been no study of how throwing these rocks 50 feet off the coast will affect the surfing spots of Puerto Rico's "surfing capital". The area of "beach breaks" reaches practically to the area of the public beach of Rincón and is not known as certainty as this work that is intended to be carried out will affect the quality of the waves and therefore the tourist activity of the whole area, which is mainly based on surfing.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
43	Neftali Rodriguez Jan 3, 2021	Totally disappointed. Suggest using breakwater, groins or any other new alternative to coast erosion. Or artificial corral / rock barriers	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

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44	Angel Ruiz Jan 3, 2021	I would like to know if energy creation using waves has been considered as a method of preventing coastal erosion. Energy production could pay for the investment in coastal improvements in the long term. I know that these systems are used in much of the planet with great success and I would like to know why they have not been considered on our island. Thanks for your attention.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
45	Viviana Gaudier Jan 3, 2021	I oppose to the South Coast Protection Plan as proposed. Please, can it be revised and try to look for a solution in a manner that it does not affect so negatively Rincon main economic source... Many families depend on the beach attraction not only in Rincon, but the abutting towns. I believe in resources conservation... but I'm sure our capable engineers can have a more positive solution.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
46	Yanira Pacheco Jan 3, 2021	I hereby oppose to the provisional proposal of the mile+ of revetment seawall in the town of Rincon, Puerto Rico. I support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant, and other experts and residents; and support the concept of building a seawall in the one area where common sense and logic indicates is an absolute need (for recreational, public safety, and economic reasons), in front of the eroding dump site by Playa Lala.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
47	Alexander Grubka Jan 3, 2021	I kindly ask you to find a less harmful solution to sea erosion than building a "wall" in the sea. Thank you.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

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48	Gisela Ruiz Jan 3, 2021	<p>We express our opposition to the plan of protection of the south coast of Rincon, as proposed by the Corps of Engineers. We understand that the solution of covered with stones a mile from the beach of Rincon will negatively impact the economic and social development of our people.</p> <p>Access to beaches for swimmers is our main tourist attraction and we must preserve it. We understand that the problem of coastal erosion in Rincon is serious, so it still requires technical, social and economic studies. Possibly a plan similar to the proposed one for Ocean Park, which integrates breakwaters and preserves the beaches, should be considered.</p> <p>I hope you'll reconsider this study.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
49	Cesar_Bocachica Jan 3, 2021	<p>I hereby oppose to the provisional proposal of the mile+ of revetment seawall in the town of Rincon, Puerto Rico.</p> <p>I support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant, and other experts and residents; and support the concept of building a seawall in the one area where common sense and logic indicates is an absolute need (for recreational, public safety, and economic reasons), in front of the eroding dump site by Playa Lala.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
50	Kelly Meagher	<p>I moved here to Puerto Rico in 2010 from Florida. While I lived in FL I saw many sea walls built to protect expensive homes built on the coast, often times we watched the homes on either side of these walls endure much worse erosion because of it. Years later we saw hurricanes devour sea walls up and down the coast. After Hurricane Maria I watched as my friends at Tres Sirenas tried desperately to rebuild their deck and pool, yet in a few years I have no doubt that it will again fall into the ocean. Unfortunately, that structure was built too close to the beach, it's a beautiful property no doubt and people pay a lot to stay there because of its proximity, but nature will take what it wants.</p> <p>Instead I think there should be more restrictions on where people can build homes, plus higher premiums for home insurance for people already living on the oceanfront. It is a luxury to live on the coast, something many people cannot afford to do, nor should the coastline be limited to the wealthy few. Why should tax dollars go to protect millionaires homes when they could just choose to live elsewhere. I do not support the building of this seawall. Nature is going to take what it wants. Instead of trying to protect what has already hastily been built, lets make a better plan for the future.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
51	Aubrey Fleming Jan 3, 2021	<p>Worried! I have visited Rincon more than 15 years ago and have seen how the tide brings us and takes sand away from us!</p> <p>I feel that constructions near the coast are the cause of erosion! It is the Buildings that want to be saved at the expense of our shores!!!!</p> <p>The University of PR and environmental leaders do not agree, and we have to support them!</p> <p>Let's demand a better option for our beautiful beaches and not a couple of rocks that go against the environment!</p> <p>Reefs are the natural barriers we have and need to strengthen to do better.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon</p>

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		Let's look at other countries like the Netherlands that have had to figure out to combat The High-Water Levels. I hope you'll reconsider this study.	will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
52	Susan Cravey Jan 3, 2021	<p>I read the full erosion report on the problems in Rincon and San Juan. As a resident of Rincon for thirty years, sixteen years of which I lived in Stella on the ocean, south of the ballpark and north of the Condos, I would like to comment on the recent proposals.</p> <p>I am totally against the revetment wall of rocks along the beach. One of the photos of Rincon in your report is the corner of an access where I now live in Stella, close to Villa Cofresi. After Maria, for three years, you could not walk south at that corner without walking in the water...three years...until after the big earthquake in January of 2020 which really shook my townhouse located right there on the corner. Within TWO WEEKS, the beach was back, wider than I had seen it in three years...and it kept coming back all through March and into April. Tons of sand were moved by something! We also had a big wave event within two days of the earthquake. We've had plenty of big wave events in the past three years that did nothing to move the sand, so again, I think it was the earthquake. And I think the sand came from the Mound, north of the canal.</p> <p>I have studied this erosion problem for nearly 25 years. I, and everyone living south of the canal, believe the erosion started with the canal being channelized. I have photos of the beach in front of my old beach house from 1989, showing that beach to be at least 40-50 feet wide. I purchased my beach house in 1998 and it had a respectable beach in front of it, but nothing like the photos from 1989. By the time I sold it in 2013, it was basically gone, and today, it is totally gone...the rock walls saving our houses but leaving no beach.</p> <p>I think breakwaters and sand replenishment is the way to go here. Eleven-foot-high rock revetments along the shore are just going to slow down the erosion and leave us with no beaches, not preserving or enhancing them. And as you said in the report, this is going to meet with lots of public backlash. We stopped the hotel and we will stop the rock walls, as well...have no doubt about that!</p> <p>And I think you, as a government agency, should take a real look at that sandbar (mound) and ask the following questions: WHEN did it form? Has it grown? How much has it grown? Has it grown to the north? In other words, could that 120 acres of sand be our beaches? And what influence has the canal had on it? I'm not a scientist, but I'm a very concerned and observant citizen. The mound of sand, the canal and the loss of our beaches are connected...and the earthquake makes it more probable.</p> <p>I have one more story before I go. When living in my beach house, I noticed the beach coming back big time! It was so narrow at the time, you couldn't sit on it with a chair. I decided to walk north and see what was happening. Again, tons of sand appeared out of nowhere within a week or so...the beach was high and wide all the way past the Cofresi and Sea Beach...I kept walking to the canal. When I got there, it had been closed off because you were repairing the rock walls along the sides that were falling in...I couldn't believe it! Could this be the reason the beaches came back? A simple reenactment of that situation may answer that question.</p> <p>I doubt anyone will read this, but I have voiced my opinion. Breakwaters and sand replenishment, please...thank you.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The study team believes that the impact of the canal is relatively small and localized. The large-scale erosion problem likely stems from many factors, but the largest are likely the continued harvesting of sand from the beach, dunes and rivers (over decades), coastal development and coastal armoring. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component.</p>
53	Valery Alicea Jan 3, 2021	I herewith express my opposition to the plan of protection of the south coast of Rincon, as proposed by the Corps of Engineers. I understand that the solution of covered with stones a mile from the beach of Rincón will negatively impact the economic and social development of the town.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in</p>

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		Access to beaches for swimmers is the main tourist attraction of the area and must be preserved. I understand that the problem of coastal erosion in Rincon is serious, so it still requires technical, social and economic studies. Possibly a plan similar to the proposed one for Ocean Park, which integrates breakwaters and preserves the beaches, should be considered. I hope you'll reconsider this study.	Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
54	Joel Marrero Jan 3, 2021	I, Joel Marrero, communicate through this means our opposition to the plan of protection of the south coast of Rincon, as proposed by the Corps of Engineers. We understand that the solution of covered with stones a mile from the beach of Rincon will negatively impact the economic and social development of our people. Access to beaches for swimmers is our main tourist attraction and we must preserve it. We understand that the problem of coastal erosion in Rincon is serious, so it still requires technical, social and economic studies. Possibly a plan similar to the proposed one for Ocean Park, which integrates breakwaters and preserves the beaches, should be considered. Citizen expression is vital right now. We invite all of our guests and followers to communicate their feelings to the Corps of Engineers on or before January 6, 2021 at the following address: PuertoRicoCoastalStudy@usace.army.mil	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
55	Mercie Martinez Jan 3, 2021	Would it be possible to just fill with sand? I have lived the loss of beaches in the San Juan - Condado - Isla Verde area by erosion caused among others by the unmeasured construction of buildings in this area. I've seen underground parking lots in Condado where the sea comes in. It is unfortunate to see the detriment of the coasts, the pollution of our seas, etc. because they lack good planning. Please pay attention to local scientists and their recommendations. These professionals warned about erosion and possible collapse due to the construction and chopping of palms on the promenade at Puerta de Tierra and we have already seen their deterioration. Let's protect our resources, please. No breakwaters or revetments.	PRIMARY CONCERN: TSP in San Juan Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
56	Miguel Bayon Jan 3, 2021	We express our opposition to the plan of protection of the south coast of Rincon, as proposed by the Corps of Engineers. We understand that the solution of covered with stones a mile from the beach of Rincon will negatively impact the economic and social development of our people. Access to beaches for bathers is our main tourist attraction and we must preserve it. We understand that the problem of coastal erosion in Rincon is serious, so it still requires technical, social and economic studies. Possibly a plan similar to the proposed one for Ocean Park, which integrates breakwaters and preserves the beaches, should be considered.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
57	Cheryl Nelson Jan 3, 2021	I am writing in opposition to the recently shared plan to put concrete in the ocean along 1 mile of the Rincon coast. My husband and I are property owners and live in Rincón part time, commuting back and forth from Ohio. We fell in love with this town for the natural beauty and friendly residents.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in

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		<p>I believe this is a very damaging plan and will only serve to protect private properties (multi-story condo buildings) that were built too close to the ocean without regard to natural consequences. Past projects have caused worse erosion than they solved.</p> <p>We need healthy and thriving beaches in Rincon for locals and tourists alike! Please do not approve this plan without significant further study as to the long-term impact to the town and our natural resources. There must be a better solution!</p>	<p>Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
58	Ossie Costas Jan 3_2021	Request to use breakwaters to keep the coasts AND NOT stone revetments. The economy of the area depends on the beaches.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
59	Juan Carlos Espinal Jan 3, 2021	<p>I hereby oppose to the provisional proposal of the mile+ of revetment seawall in the town of Rincon, Puerto Rico.</p> <p>I support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant, and other experts and residents; and support the concept of building a seawall in the one area where common sense and logic indicates is an absolute need (for recreational, public safety, and economic reasons), in front of the eroding dump site by Playa Lala.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
60	Soraya Ramos Jan 3, 2021	<p>I hereby oppose to the provisional proposal of the mile+ of revetment seawall in the town of Rincon, Puerto Rico.</p> <p>I support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant, and other experts and residents; and support the concept of building a seawall in the one area where common sense and logic indicates is an absolute need (for recreational, public safety, and economic reasons), in front of the eroding dump site by Playa Lala.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
61	Francisco Jayo Jan 3, 2021	I oppose the use of revetments and walls to reduce the wave energy in the PR northern coastal areas. The use of offshore artificial reefs is recommended.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in</p>

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			Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
62	Jenny Wright Jan 4, 2021	<p>I am very disturbed by a proposal to add a stone revetment that could ruin the beaches instead of improving them in Rincon. My parents and I would have difficulty ever getting in the water at our beach in Rincon if we have to scramble over stone, if it is even possible. We lost our beach during Maria when about 5-6 foot depth of sand was washed away and only a couple of feet have returned so I understand the desire to preserve the coast. But there must be a way that leaves it accessible for people and wildlife. I've seen how adding rocks in front of peoples walls and homes has caused the sand to bounce away instead of building up so it hard to image that more of that is the answer.</p> <p>I've also been told that the canal that was an army corps of engineer project in Rincon next to Sea beach colony sped up the erosion. Beaches were much larger prior to that. I am concerned that the next project will also have unintended consequences and there will be no one willing to fix them if there are.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The study team believes that the impact of the canal is relatively small and localized. The large-scale erosion problem likely stems from many factors, but the largest are likely the continued harvesting of sand from the beach, dunes and rivers (over decades), coastal development and coastal armoring. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component.</p>
63	Norma Vargas Jan 4, 2021	My name is Norma Vargas and I grew up in Rincón where I still live. Our beaches are one of the best worldwide and they need to be preserved and taken care of, but it needs to be done properly. Plans must be adapted to the area and to what is our currently our situation. We can not adapt plans that might be good for other areas as it is a good alternative for everyplace. Your plan will change dramatically our beaches and not for the best. I do not agree with your plans and I ask you to listen to our experts and look for a better solution to the erosion situation here in Rincón, Puerto Rico.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
64	Jose Santini Jan 4, 2021	<p>Please accept this as my formal opinion on possible solutions to the erosion problem on our shores. It has been used in the US before and is used successfully in other parts of the world.</p> <p>It has been patently clear that retaining walls on the shore itself are not only short lasting, but also create backwash which does away with what previously was a sandy shoreline.</p> <p>Furthermore, the walls eventual deterioration and collapse ends up endangering, and sometimes destructing, the very fixed assets they were meant to protect.</p> <p>Nowadays, with all the accumulated data in stock, it seems clear that we need a new approach together with more control of the permitting involved in constructing near the coastline.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

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65	Gonzalo Cardona Jan 4, 2021	<p>I want to present, under your consideration, the following scientific data for the specific erosion problem in Rincón Puerto Rico. I Include as reference the project "Life Cycle Cost analysis of beach restoration: Rincón Puerto Rico" a thesis for a Master on Science of Civil Engineering, made by the author Francisco J Villafane-Rosa and advisors Luis D. Aponte Bermudez, PE, PhD and Miguel Canals Silander PhD.</p> <p>This study includes different options for beach restoration, taking in consideration the benefit/cost ratio, these options are:</p> <ol style="list-style-type: none"> 1. Armoring the beach (Beach loss) 2. Management retreat (Land loss) 3. Beach nourishment (Costly) 4. Hybrid option (Parallel beach armoring and nourishment) <p>Beach armoring creates a stability condition, but this structure exacerbates beach erosion resulting in beach loss. The thesis divides the Rincon beach area in 6 zones... Based on data provided by the CRIM the greater income comes mainly from: zone 3 (Rincon of the Seas and Villa Cofresí), zone 5 (Between Stella to Córcega), and secondly, zone 6 (From Córcega to Calvache).</p> <p>In conclusion, this study clearly establishes that the hybrid option is justified (Benefit/Cost ratio) in zones 3, 5, and 6 because these zones represent the higher income potential for tourism in Rincón, Puerto Rico. I'll leave a link below of the thesis I made reference from.</p> <p>https://www.researchgate.net/publication/340982833 Analisis de costo de las alternativas par a mitigar danos a la infraestructura costera de Rincon Puerto Rico</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
66	Michelle Hicks Jan 4, 2021	<p>I am deeply concerned about the plans to build an 11-foot high wall up to 50' offshore in an attempt to control beach erosion.</p> <p>I have it on good authority from a marine engineer that this will only further the destruction of Rincon's beaches -Lala Beach to Domes, which includes the delicate and currently protected Marine preserve.</p> <p>I request more research and study be done before making a grave mistake that compromises rather than saves our beaches.</p> <p>It also occurs to me that this may be a political move to have an easy way to deal with the debris from the condominium complexes that have fallen into the sea during Hurricane Maria, which could have been prevented with greater and enforced building restrictions.</p> <p>In this time of climate change, I agree we must protect and preserve our natural resources, but I implore you to consider the ramifications if this is not done properly.</p> <p>Thank you for hearing my concerns and acting in an appropriate manner for the complexity of this most delicate situation.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
67	Jason Sumpter Jan 4, 2021	<p>I am writing to express my concerns with the proposed Sea Beach colony project in Rincon, Puerto Rico. As a resident of the pueblo of Rincon and Sea Beach is my local beach I do not wish to see the destruction of the beach and the consequences that it will have on the local reef and sea life just to protect the properties that run along the stretch of that beach. I oppose this project for those reasons, and I believe it is the responsibility of the property owners along that part of the coast to protect their own personal property until the ocean reclaims it. It is not the job of the Army corps of engineers to protect private properties along the coast by using tax money to do so.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon</p>


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			will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
68	Peter Walter Jan 4, 2021	<p>As a homeowner in Rincón I have a vested interest in this project. As a resident of Seaside Park, NJ I am deeply familiar with beach replenishment issues and USACE projects to remedy this issue. Bottom line is that nothing is a permanent fix as Mother Nature always takes back what she wants. That being said, the best we can do is develop a responsible method to mitigate beach erosion that goes hand in hand with the environment, the ecosystem and the economy.</p> <p>Regarding this study, my personal feeling is that a stone revetment would be the worst possible solution of those put forward. It is a quick and very temporary, short sighted fix. Ultimately, all we will be left with is continuing erosion issues and an eyesore of stone which will negatively impact waves and the ecology in its wake. Along Rincón's shoreline is an intricate web of pristine waves and marine life, such as sea turtles and elk horn corals. The revetment would permanently alter and even eradicate these fragile systems as that are key components of the successful economy of Rincón.</p> <p>Please study this area closely, all components and their potential impact before deciding on a plan forward. Stone revetments are not the answer as they will create more harm than good in the end.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
69	Edwin Font Jan 4, 2021	<p>I oppose the tentatively selected plan, proposed for the coasts of Rincon.</p> <p>My name is Edwin Font, better known as Pauco the fisherman, born and raised off the coast of Rincón, Puerto Rico. I am currently a commercial fisherman of 72 years, and all my life I have spent it on the beaches of Rincón.</p> <p>I have lived the construction of properties in the coastal area that has proliferated and its owners to protect them, have placed stones causing more erosion and preventing the use and enjoyment of humble people.</p> <p>This alternative would eliminate chinchorro fishing that is made of shore to capture species of bait that are fundamental basis of fishing other species that generate a significant economy in the municipality, which is magnified across the island. The study presented does not include the economic impact on commercial fishing that this alternative represents.</p> <p>Finally, this option would eliminate the possibility of tourism-based economic development that has been the main income of the municipality, better than the properties on the coast, it is access to the sea what attracts tourism.</p> <p>We recommend a reef submerged with live corals for the protection of the banks.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
70	Bob Smalley Jan 4, 2021	<p>I am not in favor of the beach revetment plan in the Stella area of Rincon. My 20-year experience is that storms and hurricanes come and go each year that affect Puerto Rico as do the beaches come and go. Currently the beaches have returned like they were before Maria. If a terrible storm like Maria returns it will rip any revetment apart and throw it up.</p> <p>Spend the money to help the people of Rincon who suffer from hurricanes. Improve the current electrical system and water and sewer systems. Prepare with added emergency response teams and have supplies of water and food ready when the next big hurricane arrives.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon</p>

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			will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
71	Mollie Gerber Jan 4, 2021	<p>I am writing as a student of Architecture Landscaping at the Polytechnic University of Puerto Rico and a resident of Rincón. I ask you, please listen to the local science community, to slip into your concerns of the proposal for stone revetments in Rincon. This proposed would eliminate habitat from maritime-terrestrial areas, specifically interrupting nesting of sea turtles, crustaceans, and birds that depend on native plants. The lack of vegetation, sand, and natural systems will not help the livelihood of the local, natural and socio-economic community. The sandy beaches are the heart of the community, providing invaluable services to nature, the people of Rincon, and its visitors. The construction of the revetment will eliminate the beach, and tourism in the community is affected.</p> <p>Other solutions are available to protect the flood community and rise from sea level, without the revetments. Please, we ask that you reassess the proposal of Rincon, with the livelihood of the community and nature as the priority. Invest in sustainable coastal development and coastal habitat protection. There are many examples that show the failure of the revetments, a specific example is the revetment in Vancouver, Canada, which has a bad impact on its environment and increases erosion of maritime-terrestrial areas.</p> <p>Please investigate other solutions for Rincon, revetments will do more damage than mitigation.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
72	Danielle Block Jan 4, 2021	<p>I am writing to you to express my feedback about the US Army Corps of Engineers (USACE) provisional proposal for more than a mile of rock revetment seawalls on the Rincón coastline.</p> <p>I STRONGLY oppose the provisional proposal of the mile+ of revetment seawall. However, I do STRONGLY support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant, and other experts and residents; and I also STRONGLY support the concept of building a seawall in the one area where common sense and logic indicates is an absolute need (for recreational, public safety, and economic reasons), in front of the eroding dump site by Playa Lala. This area is not included in the Corps' proposal at all and it absolutely needs to be!</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
73	Benjamin Rodriguez Jan 4, 2021	<p>I believe that stone should not be used rather could use biocompatible materials such as wood planting on the surrounding beaches almond and palm trees and with greater priority remove the remaining debris of cement and railings from fallen houses and buildings and melt any buildings built less than 150 feet from the beaches</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

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74	Sharon Leon Jan 4, 2021	<p>Thank you for attending my email communications towards this urgent island nature defense restoration. I am a volunteer for Sea Grant PR and Rincon Surf Rider Foundation, plus residents of Rincón, PR.</p> <p>I Vote to:</p> <ol style="list-style-type: none"> 1. Oppose to the provisional proposal of the mile+ of revetment seawall. 2. Support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant, and other experts and residents. 3. Support for the concept of building a seawall in the one area where common sense and logic indicates is an absolute need (for recreational, public safety, and economic reasons), in front of the eroding dump site by Playa Lala. This area is not included in the Corps' proposal at all! <p>Thank you for your attention. Please make the correct choice for nature and for the island residents!</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
75	Mark Alsbaugh Jan 4, 2021	<p>I would like to voice my opposition to the above planned project for Rincon beaches. As a resident for many years, my experience is that the rock revetment does very little for beach nourishment - in fact the contrary is true. Beach erosion occurs on both sides of the rock revetment.</p> <p>I, along with many believe, there are many more viable alternatives such as a breakwater, groin, jetty, etc. Please Mark me down as opposed to the current project as it stands.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
76	Kim Baker Jan 4, 2021	<p>In 1988 I visited Rincón Puerto Rico for the first time. I was immediately enchanted by the unique beaches and tropical vibe. After visiting for almost 30 years, we purchased a home just prior to Hurricane Maria, the most damaging and deadly storm to ever hit the island. Since September 20, 2017, we have gained almost all of our sand back that Maria whisked away. Being that we live right on the coast and just next door to the residence that we visited all those years past, we are able to witness firsthand the comings and goings of the sand. The proposed revetment project would disrupt the natural flow of the sand not to mention the crucial habitat for nesting areas as sea turtles and shorebirds. With that said, I am strongly against any project that would place rocks, boulders or concrete either on or offshore. Those of us that choose to live here know that we are vulnerable to storms. We will take that chance and let Mother Nature be the boss.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

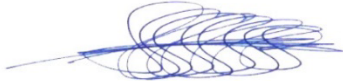
Number	Commenter	Comment	Corps Response
			
77	Sara Chico Jan 4, 2021	<p>About these projects that will protect the beach in some areas of San Juan and Rincón, Puerto Rico I will like to ask:</p> <ol style="list-style-type: none">1. What can happen if some walkups and condos in these areas decide to build a structure to reduce the erosion and protect their properties before the United States Army Corps of Engineers begins the construction?2. How these private projects can interfere with the USACE projects?3. Will these cause that the private resources of these walkups and condos, invested in these projects, can be lost? <p>I will appreciate your answers, I represent an owner in a residential building that has been advising and presenting his objections to the condo association that they need the permission of the USACE, within other permissions before starting to construct a retaining wall in the beach area. But the resident association has been very stubborn. My client is afraid that they can lose their investment and want to know if he is right or not.</p>	<p>PRIMARY CONCERN: TSP in San Juan and Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>Any work along the coast, as described, would likely involve regulatory permits by the US Army Corps of Engineers and the Department of Natural and Environmental Resources.</p>
78	Nicole Tirado Jan 4, 2021	<p>I write with concern at the intention of covered the coasts of Rincon with rocks up to 50 feet to resolve the issue of erosion.</p> <p>They try to solve the erosion that would in the long run leave us without sand or beaches. A beach without sand is not a beach. Access to the beaches is eliminated preventing recreational and economic activities on which Rincón relies heavily, also there are condominiums that are built illegally past the maritime line. They want to protect private properties but are not able to feed back the beaches with more sand.</p> <p>How much lost value will Rincon's economy cause a thing like this?</p> <p>What's the use of protecting property if they're not going to be able to go to the beach?</p> <p>Residents and visitors demand that they do not touch our beaches or free access to them.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

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Number	Commenter	Comment	Corps Response
79	Grisel Rodriguez Jan 4, 2021	<p>Thank you for attending to my email communications about this urgent restoration of the defense of the nature of the island.</p> <p>I volunteer for Sea Grant PR and Rincon Surf Rider Foundation, as well as residents of Rincon, PR.</p> <p>My vote is:</p> <p>1) Opposition to the provisional proposal for the mile of revetment.</p> <p>2) Support the creation of a modified plan developed in cooperation with CariCOOS, Sea Grant and other experts and residents.</p> <p>3) Support for the concept of building a boardwalk in the area where common sense and logic indicate that it is an absolute necessity (for recreational, public security and economic reasons), in the face of the eroded landfill of Playa Lala. This area is not included in the Corps proposal at all! Thank you for your attention. Make the right choice for nature and for island residents!</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
80	Luis Terrassa Jan 4, 2021	<p>As a resident of Condado, very close to the area of Punta Piedrita, the proposed coastal plan is extremely concerning, especially as some areas would be covered with rock.</p> <p>The stretch of beach between Condado Beach and Punta las Marias is one that shifts every year with the seasons and the currents. In 15 years living here, I have yet to see beach erosion that is not a shifting of sands from one area to another. When Ocean Park near Tapia street is eroded, our area near Punta Piedrita gets a beautiful and continuous beach (usually with calm seas and southern winds in summer). With rougher seas in the winter months, the sands shift back to Ocean Park east.</p> <p>Building breakwaters would continue to disrupt this process, and further beach erosion. What is needed is to eliminate artificial disruptions, such as buildings with seawalls built without adequate hydraulic studies, some of which are clearly visible along the shore and clearly remembered by neighbors who opposed their construction when they were built.</p> <p>The area of Punta Piedrita is a traditional recreational area, despite the fact that its park was destroyed by Hurricane Maria and was never rebuilt. For more than 30 years, the “Pocita” has been a popular recreational spot with neighbors and children... The removal of old concrete debris and rocks brought in as backfill would be much welcome.</p>	<p>PRIMARY CONCERN: Punta Piedrita</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>
81	Laura Gonzalez Jan 4, 2021	<p>Joining Attorney Frank Inserni’s objections to the Army Corp of Engineers proposed method of erosion control on Puerto Rico’s coast, I also submit that the proposal is ill-advised. It has often been proven that the shoreline in Hawaii and other places has diminished or been lost when the proposed method has been attempted. The waves break on the sand bags or rocks and act as an excavator while not being able to deposit sand later on because the pathway to the beach and sand dunes is obstructed by those same boulders at the shore or even a little further from the beach. This I have seen personally at Palmas del Mar where a big swath of the beach has disappeared in great measure by the method proposed. Your proposition attempts to save property not to reestablish the beach. Which in itself is a contradiction because your attempt will result in an increased hazard to the shoreline structures. I exhort you to reconsider the method proposed and shore up the reefs around the island and create new ones as suggested by Mr. Inserni. To avoid repetition, I incorporate to this letter all points raised and suggested by Mr. Inserni. Cordially Yours, Laura González Bothwell, Esq.</p>	<p>PRIMARY CONCERN: Hard structures</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p>


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82	JenMarie Cartagena Jan 4, 2021	This is the first time a write a note like this... We want to express our concern regarding this project, we OPPOSE to the construction of an artificial barrier in front of our paradise coast of Rincon Puerto Rico. We cannot affect nature because you want to protect structures. What we need is a law to paralyze all construction of all the coasts of our Island, for a period of more than 50 years to allow the ecosystem to recover itself naturally. This project will kill the only source of income to the people of Rincon = Tourism. Our tourism industry here is successful due to the diverse of beaches we have to perform all kinds of water sports (surfing, paddle, kayak, fishing, scuba etc.). This project will affect currents, sea life, our wonderful waves, you will kill our soul, we are the capital of surfing of the Caribbean! Please don't do this..... Thanks	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
83	Ruperto Chaparro Jan 4, 2021	Please find attached Puerto Rico Sea Grant comments regarding the COE plans for the Rincón coastline. Thanks for the opportunity to comment. Formal letter in file. No Revetment Rincon_Sea Grant a USACE_jan 2021. PDF	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.


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		<div><div><div><div><div><div></div><div><div>UPR</div></div></div><div><div>UNIVERSIDAD DE PUERTO RICO</div></div></div><div><div>Sea Grant</div><div>Puerto Rico</div></div></div></div><div>January 4, 2021</div><div>To whom it may concern:</div><div><p>These comments express the Puerto Rico Sea Grant position regarding the economic justification and Federal interest of the U.S. Army Corps of Engineers (COE), Jacksonville District plan, to reduce damages to property and infrastructure as a result of erosion, wave attack, and flooding from coastal storms and hurricanes along specific areas of the Rincón coastline.</p><p>The proposed COE plan errs since it only takes into consideration the protection of property and infrastructure, forgetting or neglecting the health of the beach ecosystem and “Other Social Effects” including, access to the beach, and the recreational and economic opportunities provided by the beaches of Rincón. These “Other Social Effects” are very important to the quality of life of residents and visitors of Rincón, and need to be included in the COE analysis, since beaches are the natural attraction that serve as a base to the economy of Rincón. The Federal response to the erosion, wave attack and flooding from coastal storms and hurricanes along specific areas of the Rincón coastline should be a hybrid project that considers an array of engineering alternatives including submerged reefs and structures, beach nourishment, appropriation and removal or relocation of abandoned structures and revetments in some areas. The same engineering actions can’t be applied to the 2.5 miles of beaches from Punta Ensenada to south of Stella community including Córcega.</p><p>Actually, there are pocket beaches with good sand to practice marine recreation activities, these will be eliminated if the proposed revetment is applied without consideration to recreational and economic opportunities they provide. A revetment for the 2.5 miles is not an appropriate solution, it is preferred to leave things as they are. What Rincón needs is to protect the natural attractions (beaches) before property and infrastructure.</p><p>The proposed revetment of 2.5 miles for the best beaches of Rincón, will result in the elimination of access to the beach and the erosion of all the sand from these beaches that are ideal to practice marine recreational activities unassociated with surfing (walking, running, paddle ball, sunbathing, swimming, snorkeling, standup paddleboards, kayaking, volleyball). Rincón is a municipality that depends on beaches, waves, water quality, sun, and sand as its natural attractions for the tourism and recreation industries. The COE needs to reconsider installing a rocks wall around the beaches of Rincón, this is not a wise solution. A beach nourishment project like the one presented for San Juan could provide Rincón with the needed protection to its natural attraction, to property and infrastructure and to the essential recreational and economic opportunities that the municipality considers essential for its economic vitality. Rincón needs a beach nourishment project that includes the structures to protect the sand from running offshore and that guarantees access to recreational and economic opportunities for residents and visitors.</p><p>I hope these recommendations help in your efforts to reduce vulnerability to the erosion, wave attack, and flooding from coastal storms and hurricanes along specific areas of the Rincón coastline. If you have any questions or concerns related to the information provided, do not hesitate to call or write.</p></div><div><div></div><div><div>Ruperto Chaparro</div><div>Director</div><div>Puerto Rico Sea Grant</div></div></div><div><div>Programa de Colegio Sea Grant · UPR-RUM · Call Box 9000 · Mayagüez, P.R. 00681-9000 · http://www.seagrantspr.org</div><div>Teléfonos: Administración (787) 832-3585, Asesoría Marina (787) 832-8045, Educación (787) 850-9385, Comunicaciones (787) 834-4726</div><div>Patrono con igualdad de oportunidades de empleo – M/F/V/I</div></div></div>	


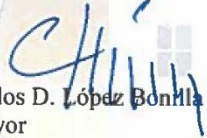
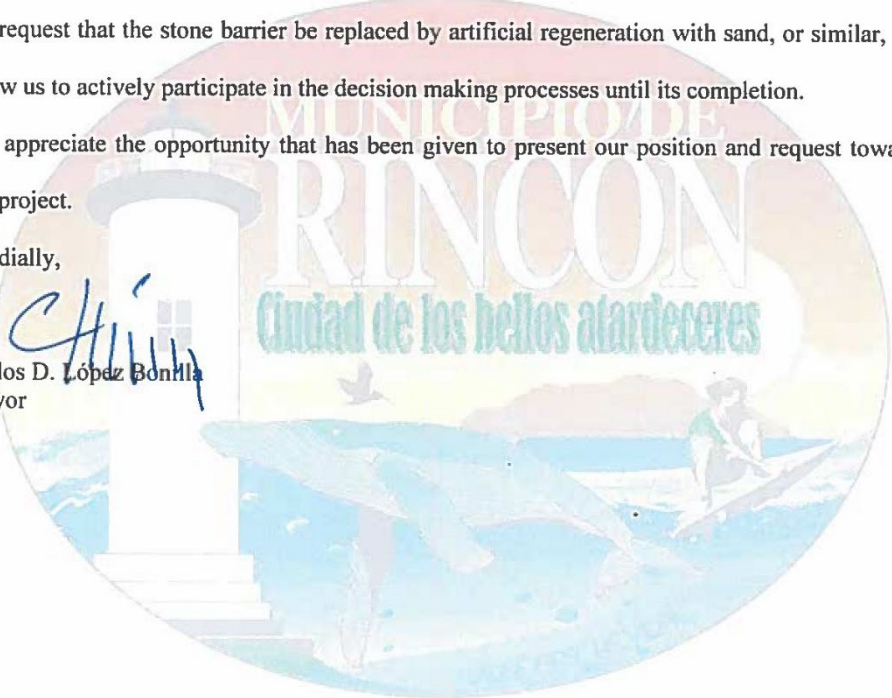
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84	Victor Cruz Jan 4, 2021	<p>I am writing to express my concern, as a U. S. Citizen and a resident of the town of Rincon, Puerto Rico, about the plans to alter the composition of some of the town’s beaches in order to control erosion. I am not a scientist, just a concerned citizen. Nevertheless, based on what little material I was able to read, I tend to agree and support Rincón Surfriders Foundation’s recommendations.</p> <p>Rincon depends heavily and is identified mostly with its waves and the surfing that comes with it. But as an Airbnb owner I have come to learn that the lifestyle brings people of all walks of life and from all parts of the world. Rincon is a worldwide destination. I have seen it firsthand in my business. We own property in the hills and have had guests from places as varied as Spain; Vienna, Austria and Frankfurt, Germany and many States of the Union. And most of them are not surfers, but it’s the lifestyle, and the ambience that this brings, plus the beaches, that keeps them coming.</p> <p>We appreciate the fact that something is being done about the problem and understand the challenges that your organization has faced. We lived in Tampa, Florida on and off for 29 years and I have read about the Kissimmee River/ Everglades situation and I am really concerned that whatever is finally done here in Rincón is not something that you have to come back to, 5 to 10 years from now, to undo. Everyone makes mistakes but this is something we would have to live with for a long time and one we may not be able to come back from. Please take your time and listen to what some of our scientists have to say.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
85	Nianti Bird Jan 4, 2021	<p>With this email I state my opposition to the Tentatively Selected Plan for Rincón. I believe further studies are required and imperative in order to arrive at a successful solution. A very extensive study has been realized by the Corps of Engineers but it is significantly lacking a study on the social impact at the site of intervention, as well as a proposed design with visuals of the solution or plan for review by the community. I hope this email and my recommendation is taken into serious consideration.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
86	Giselle Crespo Jan 4, 2021	<p>I write with concern at the intention of covering the coasts of Rincon with rocks up to 50 feet to resolve the issue of erosion.</p> <p>They try to solve the erosion that would in the long run leave us without sand or beaches. A beach without sand is not a beach. Access to the beaches is eliminated preventing recreational and economic activities on which Rincón relies heavily, also there are condominiums that are built illegally past the maritime line. They want to protect private properties but are not able to feed back the beaches with more sand.</p> <p>How much lost value will Rincon's economy cause a thing like this?</p> <p>What's the use of protecting property if they're not going to be able to go to the beach?</p> <p>Residents and visitors demand that they do not touch our beaches or free access to them.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
87	Juan de Jesus Jan 5, 2021	<p>First thank you for the study. I have 2 questions.</p> <p>1 - Can the breakwaters be engineered to form reef breaks for surfing?</p> <p>It would slow the incoming waves force, reducing erosion, create new surf spot and could even improve tourism. Surf lakes in Australia created 4 different waves based on different bottom contours and a single source of wave. Imagine creating this in ocean park or in Rincon which is the meca of surfing.</p> <p>2 - Glass isn't recycled in Puerto Rico. In San Diego there is glass beach:</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern</p>

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		<p>The famous Glass Beach in Northern California was actually formed by the locals, who used to dump rubbish on the beach from the 1940s to as late as the 1960s. Over the decades, the pounding of the waves has transformed the glass remnants into something beautiful and unusual: perfectly smooth, pebble-sized pieces that reflect shades of white, red, brown, green, blue and amber.</p> <p>We could take glass, reduce it to pebble sizes and use it to nourish the beach. New tourist spot, reduced landfill impact, and we don't need to take sand out of another area. I thought of the admirals club beach at La 8 (Old Coast Guard facilities). That beach isn't used and the waves are tearing down the retaining wall.</p>	<p>regarding the extensive impact to the environmental resources. As a note, glass beaches in California (La Jolla, Fort Bragg) results in a very different type of beach (rocky pebbles mixed with glass pebbles) than the native Rincon beach (sand), as seen in the photo below.</p>  <p>The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
88	Rosa Betancourt Jan 5, 2021	<p>I am a resident of Rio Mar (Rio Grande, PR) and I sternly oppose any measures of placing rocks or revetments on the shorelines of Puerto Rico as a solution to reducing coastal erosion, thus eliminating all future possibilities of saving and protecting our beaches. Just a look at the damage caused by the cement fences in Fortuna is enough to convince me that the proposed measures will only worsen the problem, are a waste of money and should not be implemented.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
89	Marisabel Pinero & Carlos Lopez Jan 5, 2021	<p>Letter from Mayor of Rincon. PDF with formal comments: “COASTAL STUDY- USACE January 5, 2021.PDF”</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

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		<div></div> <div><p>Estado Libre Asociado de Puerto Rico Gobierno Municipal de Rincón</p><p><i>Oficina del Alcalde</i></p><p>January 5, 2021</p><p>US ARMY CORPS OF ENGINEERS Ms. Angela Dunn 701 San Marco Boulevard Jacksonville, FL 32207-8175</p><p>RE: Puerto Rico Coastal Study</p><p>Dear Ms. Dunn :</p><p>Kind regards on behalf of the Municipality of Rincón and on my own.</p><p>On December 10, 2020, we had the opportunity to participate in the public seminar offered by your agency to disseminate the content of the “DRAFT Integrated Feasibility Report and Environmental Assessment”.</p><p>It arises from the aforementioned draft that, as part of the Mitigation Plan contemplated for this Municipality, it is proposed to armor with stones the shoreline between “Quebrada Los Ramos” and the “Comunidad Stella”.</p><p>The use of RipRap on our coast will cause the loss of practically the entire coastline in the immediate area located to the north and south of the Project.</p><p>The Municipality of Rincón is located in the fifth place in the inventory of coastal municipalities of Puerto Rico, with 53 beaches.</p><div><p>(787) 823-2180 EXT. 3000 (787) 823-3240 clopezalcalde@rincon.gov.pr www.rincon.gov.pr</p><p><i>Rincón “Pueblo de los Bellos Atardeceres”... el mejor lugar para vivir.</i></p></div></div>	

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		<div></div> <p>A large percent of the public and private municipal income is based on the economic activity generated by our privileged location and the quality of our beaches.</p> <p>Coastal shoreline protection projects, through fixed installation of stones, carried out over the past 20 years in nearby municipalities and on our coast in a limited way, have contributed to the accelerated and catastrophic erosion process.</p> <p>The effect of defense techniques classified as "hard" substantially increases erosion, which causes severe coastal flooding, the disappearance of the dune system and prevents the settlement of sediment, the latter necessary " <u>for the development of other environments such as reefs, plains of tides, marshes, sand dunes, sandy beaches and transitional wetlands</u> ". [1]</p> <p>Experience in other parts of the planet, which presented coastal erosion similar to that of Rincón, has shown that the safest and most effective technique in the long term is the artificial regeneration of beaches using sand. Not only by serving its purpose, it also contributes to ecological recovery.</p> <p>The Project contemplates the use of artificial regeneration using sand for the coast in various points of the Municipality of San Juan and excludes it in Rincón because the area to be impacted is smaller, as is the investment of funds, compared to San Juan's.</p> <div><p>[1] European Commission- EUROSION Study: Living with coastal erosion in Europe. Luxembourg: Office for Official Publications of the European Communities, 2005. Page-5</p></div> <div>2</div>	


Number	Commenter	Comment	Corps Response
		<div><p>The preservation of our coastline and our resident’s safety should not be established on the basis of economic investment. In every severe weather event that we have confronted, the cost of repairing damages has been substantial.</p><p>On behalf of the Municipality that I am honored to direct, I notify our opposition to the Project, we request that the stone barrier be replaced by artificial regeneration with sand, or similar, and allow us to actively participate in the decision making processes until its completion.</p><p>We appreciate the opportunity that has been given to present our position and request towards the project.</p><p>Cordially,</p><div><p>Carlos D. López Bonilla Mayor</p></div><div></div><p>3</p></div>	
90	Glad Donahue Jan 5, 2021	I respectfully ask that you consider a modified plan with input from local community members and experts.	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

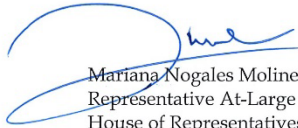
Number	Commenter	Comment	Corps Response
91	Jose Rodriguez Jan 5, 2021	<p>After living for the better part of my seventy five years directly on the coast of Puerto Rico and, having made my entire life as a sailor, surfer, boat-person, commercial fisherman, pleasure fisherman, yacht broker/ dealer, Olympic sailor and just about everything else related to fresh and saltwater, including beachcombing, lifesaving and rescues, I may honestly say that the observation of our waters and coasts, including weather, has been paramount in my formation and accumulated cognizance of our marine environment.</p> <p>My comments today will be limited to observations of coastal erosion in the very small areas within the four coves from Punta Maldonado, Boca de Cangrejos, to the East and the area by La Concha and Vanderbilt hotels.</p> <p>While the predominant currents formed by wind and Earth’s rotation in this small segment of our north coast tend to flow westward, we must be also attentive to counter currents generated by the seasonal northerly swells and to those generated by storms and by tides.</p> <p>Starting with the western side of Punta Maldonado, the most notable feature is the long, flat and narrow , peninsular shaped coralline and sedimentary rock extension that extends in a NNW direction some 500 meters towards “La Cáncora” Rock (part of the barrier reef).</p> <p>It forms the predominant buffer to prevailing winds and currents from the East and keeps Cangrejos Bay, to leeward, mostly calm. It is also the eastern boundary of a channel that connects said bay to the Piñones , Torrecilla and San José Lagoons.</p> <p>Many years back, probably middle to late sixties a rip-rap jetty was built on the southwestern side of the channel and bridge with the intention of keeping the channel from silting but it never worked, on the contrary, said channel is almost permanently silted and so shallow that boats can barely make use of it and have to rely on a detour close to the beach and and the aforementioned rocky extension to the East , which, by the way, was the original channel.</p> <p>One notable and adverse effect was the loss of coastline in a segment of at least 200 meters in length by some 20 meters inshore. To this day the ruins of a boat ramp that belonged on loan to the PR Sailing Association can be seen in the water, at least 10 meters from the shore it once abutted to.</p> <p>The structure once used by said group was destroyed by loss of shoreline and the Association had to move a couple of hundred meters Southwest to an area property of the Balneario de Carolina (the public beach).</p> <p>In an attempt to counter further erosion , a rip-rap wall was dropped on the receding shore but now the waves lap directly on it and what was left of the beach is now unusable.</p> <p>Moving again in a southwesterly direction and about a mile, or two, away we reach the next point of the cove. This is called Punta El Medio.</p> <p>Just offshore is a very small cay called, “La Islita”. When we were growing up in the area in the Fifties and Sixties we could walk on a sandbank bordered by Thalassia grass all the way from the point to the cay. In fact, on the leeward, western side of that sandbank a local commercial fisherman used to moor his fishing native sloop.</p> <p>High tide would cause water to flood the sandbank ankle deep but it was still easy to go back and forth from the shore to the cay; there were even two palm trees growing on the cay on about 100 square meters of sandy loam covered by grassy weeds and a morning glory type of creeper vine.</p> <p>This cay gave rise to the name of the area: Isla Verde (Green Island).</p> <p>The owner of the property on the tip of the point on Punta El Medio had a small concrete platform with a “gazebo “ style structure used for parties on that very tip. As the ocean was encroaching into both sides of the structure facing it, he decided to fence it with a concrete wall of some three meters in height, extending about 30 meters in each direction away from the point. Years later he would complain that the</p>	<p>PRIMARY CONCERN: Opposition to Revetments in San Juan, and in favor of artificial reefs.</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>

Number	Commenter	Comment	Corps Response
		<p>construction of the wall had contributed to the loss of all of the remaining shoreline beach below all of it due to the lapping of waves bouncing off it and taking away the sand.</p> <p>By then, with water encroaching further into his property under the wall, he made a deep linear excavation just inside the existing wall and created a new reinforced foundation and slab which he backfilled. By then the water outside the wall was about one meter deep and the currents had washed away most of the sandbank we would walk out to reach the cay.</p> <p>What was a detriment to the shoreline westward and closer to that wall became a benefit for property owners in the middle of Isla Verde cove a half mile away since the shoreline grew outward toward the ocean by about ten, or so meters with the washed-away sand coming to rest there. Not so, continuing in a westward direction, toward Punta Las Marías where shoreline-property lot owners were losing their beachfront and the sandbank spit that projected northwestward from the point.</p> <p>Again, walls were constructed and backfilled, all perpendicular to the waterline, again, all the sand washed away to rest elsewhere.</p> <p>This gradual erosion took years, until one particular building, constructed during the seventies and eighties condominium boom, constructed a breakwater (possibly with the proper permits, possibly not) on the East of Punta Las Marías.</p> <p>The previous gradual erosion to westward shorelines increased exponentially after the breakwater and area residents blamed and sued, probably to no avail.</p> <p>As we continue longshore, again westward, the erosion has affected the beaches and shoreline, evident on a grand scale at the Último Trolley public beach which has lost most of its original sand and its palm trees. Not even the deposit of a rip-rap bunch of stones has stopped the wash-away.</p> <p>Westward, the residences and guesthouses of Ocean Park point, at times have little or no beach and oftentimes waves beat directly on their beach walls. Again, it’s just a matter of time before there will be deep water and no sand in front of those walls!</p> <p>Toward the central part of Ocean Park cove the shoreline has maintained its depth and , in some cases, by Borinquen Park (Parque del Indio), slightly increased.</p> <p>Much of the sand removed eastward has come to rest there.</p> <p>Westward is Punta La Pocita (might not be its proper name) which is very rocky and has changed little with the exception of the park located there which was uplifted by a huge stormswell on November of 2017. Water simply went under the wall and foundations and uplifted it.</p> <p>We proceed westward to the beach in front of the Marriott, La Concha and , to a lesser degree a The Vanderbilt hotels. Their beaches are minimal compared to what these hotels enjoyed in the sixties and seventies. Again, gradual erosion was the norm until a huge breakwater was placed in front of the , now demolished, Convention Center, where presently is a park called, “Ventana Al Mar”.</p> <p>The backwashes and counter currents created by the breakwater have made that beach the most dangerous in all of Puerto Rico with more drownings than any other on the Island.</p> <p>Little shoreline is left in that area .</p> <p>I could go on and on with observations on other beaches and coast of Puerto Rico, only to become repetitive as the problem is of greater scope than to simply localize it to such a small area.</p> <p>What is important is to try to find a solution with better results, based on modern, more organic methods and tools.</p>	

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
		<p>What has been done so far seems to indicate an approach to counter the ocean and its forces by blocking it with walls, or breakwaters, or diversions which tend to have negative impacts, not only in the affected areas, but also in downstream and upstream areas.</p> <p>If we were to observe how our shores have been formed, our bays, our sands and beaches the one thing that remains fairly constant is the reefs, with living organisms to further their growth. Both offshore in gradual increase of their buildups, acting as barrier reefs, and inshore as natural buffers helping to dissipate and absorb the ocean’s energy, nature has provided us with a natural and effective method to counter erosion, coastline loss and to create the habitat that furthers and promotes a sustainable maintenance of existing shores.</p> <p>This being said, I oppose any temporary solutions that involve barriers, such as breakwaters in favor of submerged or semi-submerged artificial reefs which have a greater chance of becoming part of an ecosystem.</p> <p>If you have read this far, my thanks,</p>	
92	Edgardo Santiago & Mariana Nogales Molinelli (Representative At-Large of the House of Representatives of Puerto Rico) Jan 5, 2021	<p>This letter is on behalf of Mariana Nogales Molinelli, Representative At-Large of the House of Representatives of Puerto Rico.</p> <p>PDF with formal comments: “US Army Corp of Engineers.PDF”</p>	<p>PRIMARY CONCERN: Requesting review time extension.</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.</p>

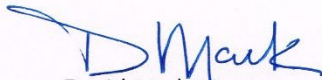
Number	Commenter	Comment	Corps Response
		<div><div>Cámara de Representantes de Puerto Rico</div></div> <p>January 5th, 2021</p> <p>Angela Dunn U. S. Army Corps of Engineers Jacksonville District 701 San Marco Blvd Jacksonville, Florida 32207-8175 PuertoRicoCoastalStudy@usace.army.mil</p> <p>Dear Ms. Dunn:</p> <p>On November 2020, the U.S. Corp of Engineers published the Draft Integrated Feasibility Report and Environmental Assessment. It is a document consisting of 231 pages, in English full of technical concepts and analysis.</p> <p>We came to know of this Report and the final date to submit comments by means of an article published on December 28, 2020 by the <i>Centro de Periodismo Investigativo</i>. Rincón podría perder su playa debido a un proyecto federal que busca proteger la infraestructura de la zona - Centro de Periodismo InvestigativoCentro de Periodismo Investigativo</p> <p>According to your webpage, a webinar was given on December 10, 2020. There was no publicity of this webinar that came to our attention.</p> <p>As we all know, we are in the midst of a pandemic that has turned our lives around and has limited our access to information because of the decrease of group activities where people usually share information and concerns.</p> <p>The proposed projects have the possibility of deeply impacting our lives and the environment.</p> <p>Three very well-known scientists have raised their concerns and have warned of the adverse consequences the two proposals may carry. Miguel Canals Silander, director of the Center of Applied Oceanic Sciences and Engineering of the University of Puerto Rico in Mayaguez (RUM), Aurelio Mercado, professor of Oceanography at the RUM and Maritza Barreto, director of the Institute for the Investigation and Coastal Planification of Puerto Rico, warned that this critical project needs to be publicized, analyzed and commented by the public for a sufficient time frame.</p> <div>El Capitolio, Apartado 9022228, San Juan, Puerto Rico 00902-2228 Tel. (787) 622-4997; (787) 622-4998</div>	

Number	Commenter	Comment	Corps Response
		<p>Residents of municipalities where coastal erosion is evident have also raised concerns. We totally agree with these concerns.</p> <p>I write to you on behalf of a community of experts and people with the utmost interest in summiting comments for these major projects. Additionally, I myself am interested in summiting comments.</p> <p>We understand that the set deadline that expires tomorrow on the 6th of January, will deprive us and the public from submitting comments and evaluating the proposal carefully that is why, we respectfully ask for a 30 day extension that will provide us sufficient time to turn in our comments for your consideration. If you have any questions, I am gladly available to provide any information you require.</p> <p>Best regards,</p>  <p>Mariana Nogales Molinelli, Esq. Representative At-Large House of Representatives of Puerto Rico</p> <p>El Capitolio, Apartado 9022228, San Juan, Puerto Rico 00902-2228 Tel. (787) 622-4997; (787) 622-4998</p>	
93	Tim Piano Jan 5, 2021	<p>We are the owners of condominium unit 5E in Victoria Del Mar, Rincon. First of all, we would like to thank you for the significant efforts that are going into completing this coastal study and the project recommendations that it will produce. We truly appreciate it.</p> <p>After attending the webinar you hosted on December 10th and after further review of the draft plan, we have a few comments/questions about the study. We understand that the primary driver for the current tentatively selected plan for Rincon is due to what appears to be a significant unfavorable net benefit for anything other than the revetment option. With that said, it appears to us that the current analysis is not taking into consideration a few things. Please advise if our understanding is correct and if it is, we would</p>	<p>PRIMARY CONCERN: TSP in Rincon – Econ analysis</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources.</p>


Number	Commenter	Comment	Corps Response
		<p>appreciate your continued attempts to incorporate some of these adjustments into the analysis to see if a more favorable (from the town or Rincon's perspective) option could be selected. We understand that you are already looking at hybrid options and we are hopeful that a much better solution will be selected. A town like Rincon without beaches will be a very unfavorable outcome.</p> <p>Our specific observations are as follows:</p> <p>1) The FWOP damages may be significantly understated due to the timing of the analysis. If we understood correctly, the current valuation of the properties placed into the beach-fx model is based on current depreciated replacement costs of the structures. If this is the case, where damages from Maria were significant and the properties had not yet been rebuilt/repared, we assume that a lower value was entered into the inventory. Given the timing of the analysis and the impacts from Maria, we believe that a much higher percentage of properties that were placed in inventory have plans to be brought back to a higher value through a rebuild/repair over the next year or two. Our condominium is a prime example given we are still working through permitting to replace the condominium's pool, patio and gazebo area. If our condominium was placed into beach-fx inventory with these assets not anticipated, then this is one example of why we feel the FWOP damages may be significantly understated.</p> <p>2) The FWP in the beach-fx model appears to only model/simulate the property damage, replacement/rebuilds.</p> <p>2a) If we are interpreting appendix C 8.2.1 correctly, it looks like "recreational" benefits can be considered if the BCR is .5 or greater. We hope that through looking at alternatives you can get the project cost down and the FWOP increased (perhaps with an adjustment based on what we described in #1 above) in order to achieve a greater than .5 BCR. With that said, in a town that is surviving based on the economics of it's recreational value, how could these economics not be included in the analysis? Even in a property only valuation approach, what would the economic damages to property values be if the town were to lose its recreational value, lose visitors and more people slip further into poverty?</p> <p>2b) It also appears in appendix C 8.2.1 that the analysis of recreational economic value is based on the number of visitors to the region and that this was estimated at only 200,000 visitors annually which might make it difficult for the recreational benefits to justify the cost. However, if this estimate of only 200,000 visitors annually was based on average visitation "over the period of analysis", how much was this figure impacted by a series of unfavorable events that impacted the region? Specifically, visitation has temporarily been significantly reduced by:</p> <ul style="list-style-type: none">- Post Maria electrical grid issues and other damages including beach erosion impacting recreation- 2015-2016 Zika Virus epidemic- 2020 Earthquake activity- Coronavirus <p>In all likelihood, (we certainly hope), this chain of unfortunate events for Puerto Rico will not repeat itself with the same frequency and visitation will return to much higher numbers than what was seen over the period of analysis. Additionally, has the number of visitors annually properly accounted for the substantial number of visitors that come from other areas across the island to visit Rincon for the recreational value? If data from arrivals from outside of the island was the primary source for this estimation, it was likely significantly underestimated. We hope that this visitation number could be adjusted for a more likely real life assumption.</p> <p>Again, we appreciate all of your efforts on this study and appreciate the opportunity to provide you with this input prior to it being finalized. We look forward to seeing how the study and proposed project is</p>	<p>In response to your observations:</p> <ol style="list-style-type: none">1. Current depreciated replacement costs of the structures are used per USACE policy.2. That is correct. During reformation, other holistic effects for environmental quality, other social effects, and regional economic development, were assessed per recent comprehensive benefits guidance, which are included in this re-released draft report and which lead to the tentatively selected plan.3. Per USACE policy, projects cannot be formulated or justified by recreation; they are considered to be incidental benefits. <p>The tentative plan for Rincon will restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component.</p>

Number	Commenter	Comment	Corps Response
		finalized and we are hopeful that it will result in an option that is a win-win for both the primary and secondary objectives of the project.	
94	Frank & Monica Martin – Liz Rosenfeld Jan 5, 2021	<p>We would like to register our objection to the proposal for revetments to solve the erosion issues along the stretch of shoreline from Corcega north to about Sea Beach. It does not seem appropriate to render unusable the beaches that remain usable today in this stretch. We make further points/ask questions below:</p> <ol style="list-style-type: none">1. We found the report submitted difficult to understand and somewhat contradictory in places. It would have been helpful too, to have had a drawing of what a post-project shoreline would look like. Talking with others who read the report, the length of the remedial work is unclear. Does it really plan to go up to the canal after Rincon of the Seas?2. There is mention in your report something about property values. Although letting things as they are might devalue properties, so will the proposed solution. So this alone cannot be the right answer.3. It was not made clear why a break water offshore was not a feasible solution. This in conjunction with sand replenishment might be a reasonable solution.4. The report does not make clear the <u>environmental consequences of the project</u>. Will further environmental study be undertaken?5. Further this type of solution may be “rewarding” greed/bad decision making. Your report shows a picture of the Ocean II condos at the southern end of Corcega. Even when this was built many years ago (25?) local residents objected and also commented that they were being built too close to the ocean, they should have been set back. Although they were not contravening planning laws at the time, it would have been clear to the experts that they should have been set back further. Why are we now looking for a solution to save this sort of development? The measures that the condo developers then used to try to save their beachfront also harmed others’ beaches in terms of excess erosion. Then you get some place like Rincon of the Seas that has quite a lot of beach left and is set back quite far from the water so as to minimize the chances of falling into the ocean. Why should it have to deal with rocky beaches having been a responsible developer? We would think that many houses along the stretch of coast considered in the study are commercial properties or 2nd homes. Although one would not want people to lose their assets, we do not believe you are looking at people losing their homes. Again, unless the owners have been in place for 30 years, anyone buying a beachfront property would have known there were issues with erosion. So, there should be a balance between retaining sandy beaches and saving properties. Maybe grants to move properties further back would help, although this will not be feasible the length of the coast in question. Maybe more attention should be given to saving infrastructure for the long term, like roads.6. Any project of the kind being considered (saving the coast), should be made in conjunction with commitments from the town/state/etc to amend planning laws (and enforce them)to ensure properties are not allowed to be built or expanded too close to the coast. <p>We trust that the Army Corps of Engineers will revisit their proposal. We would also welcome further public forum for this issue.</p>	<p>PRIMARY CONCERN: TSP in Rincon – Rincon of the Seas</p> <p>Thank you for your comments and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

Number	Commenter	Comment	Corps Response
95	David Mark Jan 5, 2021	<p>PDF with formal comments: “DMark - Comments to USACE Study”</p> <div><p>DAVID MARK IRIZARRY 5 CALLE SANTA CECILIA / SAN JUAN, PUERTO RICO 00911 / TEL (787) 648-5072</p><p>January 4, 2021</p><p>US Army Core of Engineers ATTN: Angela Dunn 701 San Marco Boulevard Jacksonville, Florida 32207-8175</p><p>RE: Community of Ocean Park, San Juan, Puerto Rico Public Comment to USACE Puerto Rico Coastal Study</p><p>Gentlemen:</p><p>As President of the Board of Directors of Calidad de Vida Vecinal, entity that represents that the Ocean Park Community, I would like to express my gratitude to the USACE for the study in reference, and hope that this is the first step toward implementing a coastal management program for the San Juan coastline.</p><p>Ocean Park has one of the nicest beaches in all of San Juan. People come from all parts of our island to enjoy it. Tourists visiting our Island enjoy it as well. It contains some of the most desirable beachfront real estate in San Juan. For these reasons, I believe it is important that the final design take into consideration the following:</p><ol style="list-style-type: none">1. The beach is used by locals and tourists for walking and other beach activities. These activities are dependent on having a beach with an ample area of sand. Including a program of sand replenishment in the final design is important.2. Numerous water sports are done in the waters in front of the Ocean Park beach. These activities include sailing, windsurfing, kite-surfing, kayaking, snorkeling and fishing. The breakwaters being proposed need to take these activities into consideration so as not to impede the practice of these sports.3. Over the years, both public and private properties have been affected by beach erosion and the impact of ocean waves. This has resulted in the construction of vertical structures to protect roads, utilities, houses and buildings. While necessary, these vertical structures can be detrimental to re-establishing a beach. The final design needs to consider the mitigation of these vertical structures.</div>	<p>PRIMARY CONCERN: TSP in Ocean Park – letter of support</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.</p> <p>The new tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features.</p> <p>We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.</p> <p>Thank you for your comments and support.</p>

Number	Commenter	Comment	Corps Response
		<p>4. Our community, as well as the adjacent communities, include a low lying area susceptible to flooding and dependent of pumps for draining any storm sewer water. As made evident by Hurricane Maria, ocean waves breaching the coastline contribute to the flooding of these areas. Including elements of design that would help prevent this situation need to be considered.</p> <p>I hope that my comments and concerns are of help, and that they be considered in the final design of the coastal management program. I thank all those involved in the study, as well as the assistance provide by Mrs. Sheila Hint and Mr. Jorge Tous in explaining to our community the goals and timeline of this study.</p> <p>Cordially,</p>  <p>David Mark Inzarry Calidad de Vida Vecinal Urb. Ocean Park</p>	

Number	Commenter	Comment	Corps Response
96	Sandra Caro – Hotel Villa Cofresi Jan 5, 2021	<p>Greetings from Rincón, Puerto Rico, Town of Beautiful Sunsets. My name is Sandra Y. Caro, General Manager and Owner of Villa Cofresi Hotel and Restaurant, right on the beach in Rincón, Puerto Rico.</p> <p>Our hotel was the first one built in Rincón, almost 56 years ago. It started in February of 1965. It started as a small and humble restaurant and bar and then in 1968 the first rooms were built for the Surfing Championship held here at the end of that year. Today we are still the biggest hotel in Rincon with 121 rooms. The hotel was built very far from the ocean, not in the maritime zone. Unfortunately, global warming and hurricanes have affected our beach.</p> <p>We need to come up with techniques for the erosion problem in our area. We are very grateful for everything that is being done by the Army Corps of Engineers towards this goal. We understand that the stone revetment that is being proposed is not the best technique because it will leave us with no access to the beach.</p> <p>The first industry in Rincón is the tourism company. That would be detrimental for our town.</p> <p>We ask you respectfully to reconsider this alternative and present us with other ones that do not affect our beach access.</p>	<p>PRIMARY CONCERN: TSP in Rincon – Villa Cofresi</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component.</p>
97	Instituto de Arquitectos Paisajistas – Teresita Del Valle Jan 5, 2021	<p>PDF with formal comments: “Comments on USACE - PR CSRMF Coastal Feasability Study – FINAL”</p> <p>Several comments about Rincon and San Juan alternatives.</p>	<p>PRIMARY CONCERN: TSP in Rincon and San Juan</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.</p> <p>A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features.</p> <p>We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.</p>


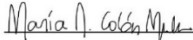
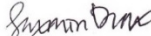

Number	Commenter	Comment	Corps Response
		<p>IAPPR Comments to USACE Puerto Rico Coastal Study Integrated Feasibility Report and Environmental Assessment Report (11.20.2020)</p> <div></div> <p>January 5th, 2021</p> <p>To: Angela Dunn, U.S. Army Corps of Engineers, Jacksonville District</p> <p>Email: PuertoRicoCoastalStudy@usace.army.mil</p> <p>Address: 701 San Marco Blvd. Jacksonville, Florida 32207-8175</p> <p>Re: Comments to Puerto Rico Coastal Study - Integrated Feasibility Report and Environmental Assessment Report (USACE)</p> <p>From: Instituto de Arquitectos Paisajistas de Puerto Rico</p> <p>Email: iappr.presidente@gmail.com ; tdelvalle@cappr.org</p> <p>Address: 225 Calle Del Parque, San Juan, Puerto Rico 00912</p> <p>Dear Ms. Dunn and interested parties of the USCAE:</p> <p>Thanks for the opportunity to comment on the Puerto Rico Coastal Study: The Integrated Feasibility Report and Environmental Assessment Report ("the Report"). The Puerto Rico Landscape Architects Institute - "Instituto de Arquitectos Paisajistas de Puerto Rico" (IAPPR) - as representatives of the Landscape Architecture Profession in Puerto Rico, feel the professional responsibility to comment on this document with the intention to effectively address the important consequences of the strategies the USACE is proposing to incorporate in the planning and design for the various coastal sites in two municipalities, Rincon and San Juan, Puerto Rico. We, as Landscape Architecture professionals, would like to contribute to the actions proposed, collaborating and serving in any way we can, to improve the health, safety, and welfare of the Earth's habitats and their inhabitants, especially our beloved Puerto Rico shores.</p> <p>The following are comments and recommendations from our professional guild, IAPPR, regarding the <i>Puerto Rico Coastal Study: The Integrated Feasibility Report and Environmental Assessment Report</i>:</p> <ol style="list-style-type: none">Provide an extension of time for comments. <p>The IAPPR would like to request more time to further study and discuss the document and make comments as a professional collective, providing the USACE informed suggestions, comments and references within an additional 60 calendar days for submission (before or on March 30, 2021). Our calculations estimated that only 29 working days were provided for comments from Nov 20th 2020 to January 6th, 2021, during which time many important local and national events were scheduled that provided a discontinuous working time to gather responses. This timeline has also</p> <div><div><p>Instituto de Arquitectos Paisajistas de Puerto Rico Calle del Parque 225 San Juan, PR 00912 t. 787-724-1213</p></div><div><p>1</p></div></div>	

Number	Commenter	Comment	Corps Response
		<p>IAPPR Comments to USACE Puerto Rico Coastal Study Integrated Feasibility Report and Environmental Assessment Report (11.20.2020)</p> <p>coincided with COVID-19 related lockdowns and quarantines that have added additional barriers to communication and access to community and professional groups.</p> <p>2. Improve community engagement, both civic, academic and professional.</p> <p>The proposed project, as described in the Report, will deeply affect many communities, human and ecological. For this reason, the most important action is to have further and inclusive community engagement before the project proposal continues, with a deliberate and intentional process that includes multiple professional expertise available in the local scientific, environmental, social and professional communities. There are no better professional consultants for this proposal than people who have worked, lived, observed, and studied this land/sea interface and its local dynamics for many years, both from scientific/technical and humanities points of view. We recommend providing time and space for local multidisciplinary opinions to be formulated from scientific experts, biologists, urban planners, landscape architects, architects, sociologists, artists, nonprofit social and environmental groups, local government agencies and municipality mayors.</p> <p>3. Prioritize and reduce project scope to Rincon B.</p> <p>The Report explains how the project initial studies made viable scope reduction as the initial sites were evaluated during the project timeline since 2018, we further recommend that a priority should be given to the project located in Rincon B and that San Juan proposals be removed or separated from this project timeline, given that impacted and broken concrete structures are still present at Rincon's Corcega shore since the initial ocean wave damages in 2016. There is an imminent threat and risk in Rincon B which should be given complete focus and priority. San Juan's Condado, Ocean Park and Punta Las Marias locations do not pose an imminent threat to human life or infrastructure at this time. We understand the value of loss is greater at the San Juan localities due to larger and denser infrastructure, higher cost of investments and a much larger impact zone, but at the same time we understand that the USACE feasibility study has not considered the complexities and dynamics of the San Juan beaches of Condado and Ocean Park.</p> <p>4. Re evaluate project strategy combinations.</p> <p>The strategies proposed in the Report provide a very narrow understanding of the coastal dynamic's problems. In general, most of Puerto Rico's shorelines are affected by similar threats: Surge, Erosion, Flooding and, most importantly and unpredictable, Climate Change and Sea Level Rise. While a very unpopular alternative, the honest most safe strategy to mitigate risk and prevent damage is to retreat from the shore. Yet the impacts of retreat, at first glance, appear to have deep economic and cultural impacts, and limited implementation opportunities in a short timeline. But in a 50-year planning scenario, some of the currently discarded alternatives, like construction moratoriums, expanding a no-build zone within the MTZ, and revisited</p> <p>Instituto de Arquitectos Paisajistas de Puerto Rico Calle del Parque 225 San Juan, PR 00912 t. 787-724-1213</p>	


Number	Commenter	Comment	Corps Response
		<p>IAPPR Comments to USACE Puerto Rico Coastal Study Integrated Feasibility Report and Environmental Assessment Report (11.20.2020)</p> <p>and re-envisioned strategies, like increasing the horizontal depth of the top of berms or revetments, could actually produce longer lasting, long-term ecological and safety benefits that allow for a slow, yet determined, retreat strategy that allows for cultural and economic adaptations to these measures.</p> <p>The proposed alternatives provide for single purpose benefits that may or may not provide other marginal or tangential ones. We understand that if these marginal benefits (ecological, environmental, social, cultural) are treated as integral mission objectives, the proposed strategies will be multi-use, multi-benefit and balanced.</p> <p>While specific recommendations for each planning reach are stated below, a general recommendation for this topic is for the USACE to include local scientists, design professionals and community leaders in this assessment and planning phase. These will be instrumental in building buy-in from the communities and helping guarantee project success.</p> <p>Rincon B:</p> <p>We recommend implementation of a balanced approach similar to alt 5: Beach nourishment and underwater artificial reef breakwaters, with an evaluation of the MTZ limit by removal of existing wall structures and relocation of property limits where these compromise the MTZ limit. The discarded no-action strategies that would limit construction within the MTZ, plans that provide funding for removal of existing structures, and other, not currently studied, actions of environmental restoration, could provide added benefits, when accrued, in the long term. The enforcement of these actions would fall under State jurisdictions, but could be a requisite from contracts with USACE as part of long-term maintenance requisites to guarantee enforcement.</p> <p>Stone revetment of 5,650 ft along the shore does not improve the ecological, social, economic or aesthetic value of the Rincon Shoreline. On the contrary, it hinders natural shore ecotone dynamics, will eventually worsen the erosion problem, and alienates human use of the beach for leisurely activities denying access to the beach, walking on the beach, safe entry to the water and other important activities that would be obstructed by stone revetment. This action alone and disassociated from other actions will have costly negative social, economic, ecological, and aesthetic consequences, immediately and for years to come. It is clear that the total costs - ecological, social and aesthetic - outweigh the economic benefits of the proposed actions and have not been adequately factored in by the USACE in their calculations.</p> <p>San Juan Shores:</p> <p>We recommend no action on all three proposals: Condado Pocket beach, Punta Piedrita, Ocean Park Beach Pocket and Punta Las Marias. We understand that the complexity of the San Juan beaches has not been clearly understood by the USACE PR Coastal Study. We also recommend a separation of San Juan Shores from the rest of the project, a new project timeline that includes further feasibility and</p> <p>Instituto de Arquitectos Paisajistas de Puerto Rico Calle del Parque 225 San Juan, PR 00912 t. 787-724-1213</p>	

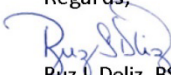

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		<p>IAPPR Comments to USACE Puerto Rico Coastal Study Integrated Feasibility Report and Environmental Assessment Report (11.20.2020)</p> <p>environmental studying, community engagement and a look at modelling balanced approaches to all areas, such as artificial reef breakwaters and beach nourishment, MTZ limit evaluation with local authorities and designed space creation. We recommend further studies and modelling for all the Beach pockets.</p> <p>We do not recommend beach revetment as a viable alternative on any shoreline that has urbanized infrastructure adjacent to the beach. Again, as in the Rincon shore, this hinders social interaction, ecological health and economic and aesthetic value.</p> <p>5. Prioritize environmental, ecological, social and cultural objectives.</p> <p>Given that the project life span has been projected to endure 50 years (2028-2077) we recommend prioritizing all objectives and enhancing opportunities. With the intention of warranting that the project will be successful in protecting infrastructure, investment, and communities, the environmental quality, ecological and social sustainability, and health, should also be key objectives to integrate in the study. As stated in appendix F, as of now, these considerations are "other social effects"; but they're not.</p> <p>As stated in the PR Coastal Study:</p> <p>Opportunities: Maintain recreation: Area depends heavily on tourism, as well as aesthetic quality for the community. Maintain or enhance beach habitat/environmental resources.</p> <p>Main Objective: Manage the risk of damages from wave attack, flooding, and erosion caused by coastal storms.</p> <p>Secondary Objectives: Maintain recreation: Area depends heavily on tourism, as well as aesthetic quality for Community. Maintain or enhance beach habitat/environmental resources.</p> <p>Constraints: Avoid or minimize impacts to cultural resources, reef resources, submerged vegetation and critical infrastructure.</p> <p>The tentative proposals in the study do not account to achieve the secondary objectives, enhance the existing opportunities, or avoid or minimize impact to cultural resources, ecological resources or critical infrastructure in a meaningful manner. Even in the OSE tables, most of the social, leisure and economic criteria have low or negative scores which reinforce the notion that these are not really important issues.</p> <p>On the other hand, ecological impacts to marine life, particularly related to hard-bottom habitats and all the associated species, while accounted for, is clearly undermined and undervalued in this preliminary study. The impacts to these types of habitats are usually irreversible and irreplaceable, and mitigating the effect is long and costly.</p> <p>We reiterate that these secondary objectives and constraints need to be addressed before moving forward with any design of these.</p> <p>Instituto de Arquitectos Paisajistas de Puerto Rico Calle del Parque 225 San Juan, PR 00912 t. 787-724-1213</p>	

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
		<p>IAPPR Comments to USACE Puerto Rico Coastal Study Integrated Feasibility Report and Environmental Assessment Report (11.20.2020)</p> <p>At the end of this document, we have included a list of recommended references that include studies of the Puerto Rico shores and other global case studies that deal with the imminent threat of sea level rise and increasing climate action around the globe.</p> <p>Thank you for considering our comments to the Report. We remain available for future discussions about these proposed actions and offer the resources of IAPPR to improve the conceptualization of this project. Please consider us a concerned party for future consultations about this project and keep us abreast of further actions on this matter.</p> <p>Sincerely,</p> <div><div> RA, LAIT, Teresita M. Del Valle President</div><div> LA, Maria N. Colon-Mulero Vice-President</div><div> Agro, LAIT Jasmin R. Diaz Secretary</div></div> <p>Instituto de Arquitectos Paisajista de Puerto Rico - IAPPR (Puerto Rico Landscape Architects Institute)</p> <div> INSTITUTO DE ARQUITECTOS PAISAJISTAS DE PUERTO RICO</div> <p>Collaborators:</p> <p>LA, RA Edmundo Colón Izquierdo (ex President IAPPR)</p> <p>LA, José J. Terrassa-Soler (ex President IAPPR)</p> <p>IAPPR Comments to USACE Puerto Rico Coastal Study Integrated Feasibility Report and Environmental Assessment Report (11.20.2020)</p> <p>Recommended References:</p> <p>Bush, D. M. (1995). Living with the Puerto Rico shore. Durham: Duke University Press.</p> <p>Chase C., Gonzalez G, Gorman D, and Higginbottom S. (2011) Assessing Critical Infrastructure in Puerto Rico's Coastal Zone an Interactive Qualifying Project Report. https://web.wpi.edu/Pubs/E-project/Available/E-project-050411-121701/unrestricted/Assessing_Critical_Infrastructure_in_the_Puerto_Rico_Coastal_Zone.pdf</p> <p>O.E.C.D. Organization for Economic Co-operation and Development (2018). <i>Innovative Approaches to Building Resilient Coastal Infrastructure</i> https://espas.secure.europarl.europa.eu/orbis/sites/default/files/generated/document/en/9c8a13a0-en.pdf</p> <p>Orf, Kate. (2016) <i>Toward an Urban Ecology</i>. Monticello Press. New York, NY.</p> <p>Ray G.C., Hayden B.P. (1992) Coastal Zone Ecotones. In: Hansen A.J., di Castri F. (eds) Landscape Boundaries. Ecological Studies (Analysis and Synthesis), vol 92. Springer, New York, NY. https://doi.org/10.1007/978-1-4612-2804-2_21</p> <p>Post-María Beach Assessment. El estado de las Playas de Puerto Rico Post- María. https://storymaps.arcgis.com/stories/dfb5b1a22af6440b809cde3aac482b42?fbclid=IwAR2zL3lVnHSbAVFml33zeyQk1fYulO1Dm_F3uwUznlaGdF079sXjaQCgvo</p> <p>EUROSION project. 2005. Living with coastal erosion in Europe: Sediment and Space for Sustainability, European Communities. SÁNCHEZ-ARCILLA A. ,JIMÉNEZ JA & SIERRA JP (2005). B11-Zones costaneres – (Chapter of Informe sobre el Canvi Climàtic a Catalunya), Consell Assessor per al Desenvolupament Sostenible de la Generalitat de Catalunya MINISTERIO DE MEDIO AMBIENTE. Impactos en la costa española por efecto del cambio climático. (Part of Fase III. Estrategias frente al cambio climático en la costa).</p> <p>http://www.euroasion.org/index.html</p>	

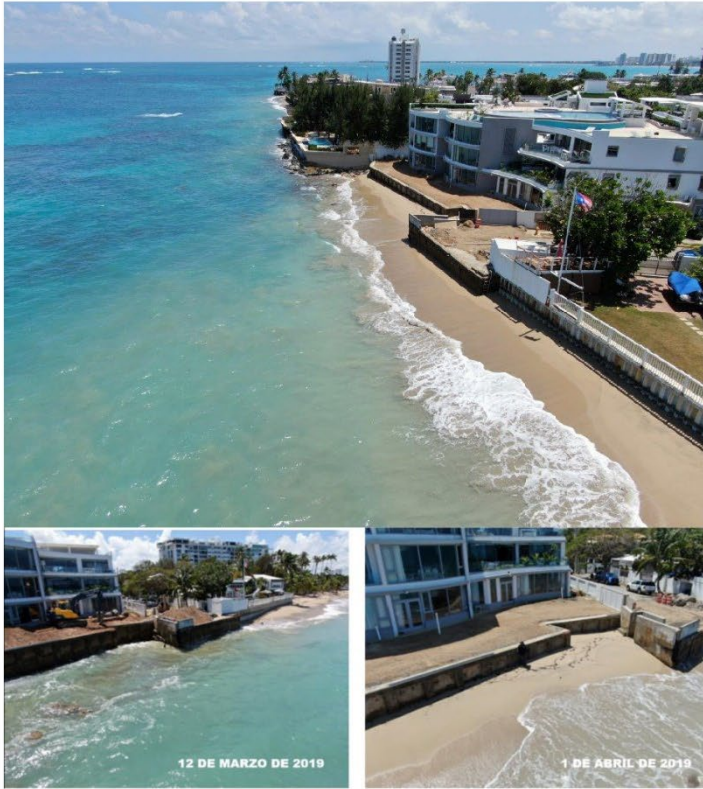
Number	Commenter	Comment	Corps Response
98	Mona&Douglas Chaffin Jan 5, 2021	<p>We have been visiting the Rincon area for over ten years and since retirement, have spent three to four months per year there. Our attraction to the area is the beautiful sunsets, beaches and wonderful people. The property where we have stayed for the past eight years was impacted greatly by Hurricane Maria in 2017. Although the inside of the Victoria Del Mar building has been restored and shored up, the outside is still waiting for permits to restore the patio, gazebo and pool. The design has been approved but the final permit has stalled for some reason that we do not know. There was a beautiful, wide beach in the Corcega area when we started visiting Puerto Rico and now there is nothing. Before Hurricane Maria we were able to walk the beach for miles which was one of the biggest draws for the Rincon area.</p> <p>We have listened to the Webinar that was presented on December 10th, 2020 and read the Marejada October 2012 magazine articles regarding the Rincon area. We appreciate all of the studies and work that has gone into these issues. We are confident that a comprehensive, satisfactory resolution can be achieved and construction on the solution can get started. It has already been three and a half years of destruction.</p> <p>Rincon deserves to come back from all the tragedies it has suffered. Tourism is essential to this beautiful area and should not be ignored.</p> <p>Thank you for your work to date. We look forward to a good and speedy move to the commencement of the remediation project.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
99	Organization Pro Ambiente Sustentable - Ruz Deliz Jan 5, 2021	<p>PDF with formal comments: “USCoE comments”</p> <p>Several environmental concerns about TSP.</p>	<p>PRIMARY CONCERN: TSP in Rincon and San Juan</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>



Number	Commenter	Comment	Corps Response
		<div><p>BLUE FLAG® Puerto Rico Office</p></div> <p>January 5th, 2021.</p> <p>Ms. Angela Dunn U.S. Army Corps of Engineers Jacksonville District, 701 San Marco Blvd. Jacksonville, Florida 32207-8175</p> <p>Re: draft Integrated Feasibility Report and Environmental Assessment report</p> <p>Via: PuertoRicoCoastalStudy@usace.army.mil</p> <p>Ms. Dunn:</p> <p>In representation of Blue Flag and Organización Pro Ambiente Sustentable (OPAS), I would like to extend some comments regarding the Puerto Rico Coastal Study-Draft that is under current evaluation from the agency.</p> <p>Puerto Rico’s beaches are owned by the public and the government is required to preserve them. According to public policy and the mandate under Law Num. 173 from 2000, as amended on Law Num. 269 from 2008 , “Programa para la Promoción, Protección y Conservación de las Playas de Puerto Rico Aspirantes a la Bandera Azul” (Program for the Promotion, Protection and conservation of Puerto Rico’s Beaches aspirants to Blue Flag) our intention is to safeguard and conserve our beaches while taking in consideration all three sustainability pillars: social, economy and the environment.</p> <p>Based on local and international scientific data we would like to express the following:</p> <ul style="list-style-type: none">• the loss of beaches threatens the way of life in the island and imperils the state’s tourist-driven economy.• the environmental damage of coastal armoring is clear, species including some endangered like the leatherback turtles, will lost more critical shoreline habitat• the turbulence and pollution caused by waves slamming into armoring has been documented and stablished, in many cases harming already-stressed coral reefs and threatening to disrupt some of the islands’ famous surf zones <p>www.opasapr.org ♦ (787)230-7802 ♦ P.O. Box9300845 San Juan PR 00928</p>	

Number	Commenter	Comment	Corps Response
		<div><ul style="list-style-type: none">• as established by the Environmental Protection Agency: “Beaches are an important part of American life. In addition to the range of recreational opportunities they offer, beaches provide unique habitats for a variety of plants and animals. Beaches provide protection to residents living near the ocean by acting as a buffer against the high winds and waves of powerful storms, and help drive economic activity important to nearby communities. Beaches also play an important role in the economy. Spending time at an ocean beach is one of the fastest-growing nature-based outdoor activities in the United States.”<ul style="list-style-type: none">○ The possible loss of our shores will not only be a serious impact to tourism but also an environmental one with<ul style="list-style-type: none">▪ the use of rocks in sandy baches▪ armoring the shoreline to protect infrastructure, properties and real state value without a broader ecosystemic approach• Marine ecosystems provide many critically important services that people benefit from, often at no direct cost to us. It is important to ensure that ecosystem health and integrity are maintained under any feasible solution so that ecosystems continue to provide these services to us all.• Any shoreline stabilization method will need to, not only take care of the needs of the residential zones and infrastructure but to balance the needs of the natural system that our communities depend for recreational, commercial (tourism, fishery, others) benefits.• As suggested by local experts we urge the use of more recent data for a sharper analysis.</div> <div><p>We acknowledge that over many decades, oceanfront developers across the commonwealth have used an array of loopholes in state laws and the permitting process to get around the maritime policies and regulations, at the expense of the environment and public shoreline access.</p><p>To finalize, we respectfully request an extension to the comments’ period to provide a better time frame for more parties with interest to respond. Thank you for taking into consideration our remarks.</p></div> <div><div>Regards,  Ruz I. Deliz, BSEnvEng Blue Flag - Puerto Rico Operator Executive Director - OPAS</div><div></div><div>www.opasapr.org ♦ (787)230-7802 ♦ P.O. Box9300845 San Juan PR 00928</div></div>	

Number	Commenter	Comment	Corps Response
100	Awilda Rodriguez Jan 5, 2021	<p>I team up with Rincon residents' claim to avoid being left without beach areas in the Stella area and surfing area.</p> <p>We call for a project that tempers the need to avoid erosion but without eliminating beach areas on those shores. Eliminating the beaches negatively impacts the touristic era, which is the largest income in Rincon and which also negatively affects us the value of the properties of the Stella community.</p> <p>We support a modified plan that takes into consideration our needs.</p> <p>Thank you for your attention.</p> <p>Signatory residents: Ruben Rodriguez, Awilda Rodriguez, Mariely Perez; Isaac Perez, Simon Diaz, Elsa Suarez; Pedro Gonzalez</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
101	Maretsa Rodriguez – GK Realty Jan 5, 2021	<p>Enclosed G-K Realty, LLC comments to Puerto Rico Coastal Study Feasibility Report regarding Punta Las Mariás San Juan, Puerto Rico.</p> <p>PDF with formal comments: “G-K Realty, LLC Comments to PR Coastal Study”</p>	<p>PRIMARY CONCERN: TSP in Punta Las Marias</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan with updated information about existing conditions.</p> <p>A rock revetment is no longer being proposed on Punta Las Marias. Erosion was assessed but was found to have seasonal shifts in sand, and damages to structures from erosion was found to be at lower risk than damages from coastal flooding. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features.</p>

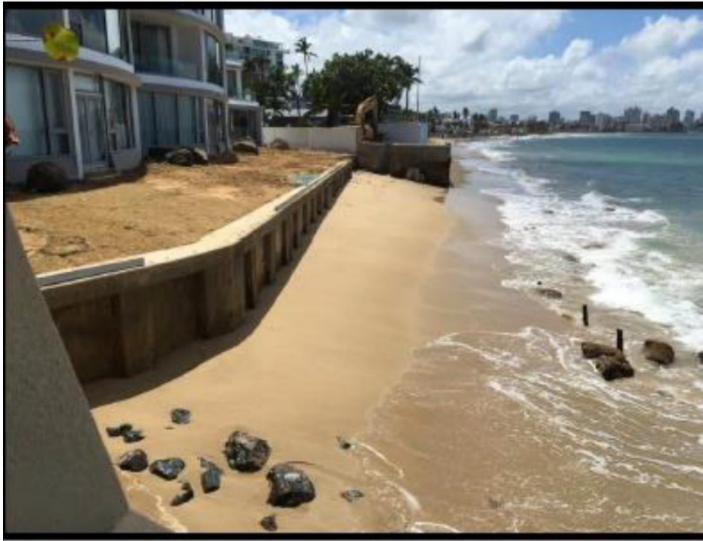
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		<p style="text-align: center;"><i>Lcda. Maretsa Rodríguez Portela</i></p> <div style="display: flex; justify-content: space-between;"> <div> <p>P.O. BOX 699 CAGUAS, PUERTO RICO 00726</p> </div> <div> <p>ABOGADA NOTARIO</p> <p>TEL. (787) 746-5285 rodriguezportela@gmail.com</p> </div> <div> <p>CALLE JUAN JIMÉNEZ GARCÍA #32 URB. PLÁ CAGUAS, P.R. 00725</p> </div> </div> <p style="text-align: center;">January 5, 2021</p> <p>Colonel Andrew D. Kelly, Jr. District Commander Corps of Engineers, Jacksonville District Department of the Army</p> <p style="text-align: center;">Comments to Puerto Rico Coastal Study draft Integrate Feasibility Report and Environmental Assessment report</p> <p>Dear Sir:</p> <p>G-K Realty, LLC is the owner of four individual properties 2; 4; 6 and 8 in Bucare Street in Punta Las Marías, San Juan, Puerto Rico. As G-K Realty legal counselour we and our expert advisor Lina Dueño (AIA, AICP-CUD, LEED-AP, PPL) have reviewed the reference Study and find that certain facts concerning the existing conditions on the Punta las Marías shore as well as existing regulations in local jurisdictions are ignored in the Study.</p> <p>If they were recognized, the study's conclusions would be different.</p> <p>Included are the salient features of the Study which require discarding its recommendations:</p> <p>2.3.1 Shoreline Conditions: Exiting Conditions In the Study (page 2-33), the existing conditions for the easterly segment of Ocean Park, where Punta Las Marias is situated, are erroneously described as an area with few or no dry beaches.</p> <p>A more careful observation of the existing conditions would have identified that there are several areas where there are sand deposits between the existing seawalls and the ocean. One of the seasonal beaches is located at the end of Almendro Street.</p>	



Number	Commenter	Comment	Corps Response
		<div data-bbox="817 423 1485 1175"></div> <p data-bbox="817 1205 1672 1286">Figure 2-23. San Juan Study Area Coastal Protection The shore between Park Boulevard Condominium and Punta Las Marías point is described as consisting of a seawall.</p> <p data-bbox="745 1316 1672 1397">In reality, there is not a uniformly well-constructed seawall, but a disjointed assortment of property protections, a variable distance from the seashore and with variable amount of sand in front.</p>	

Number	Commenter	Comment	Corps Response
		<div data-bbox="817 368 1485 870" data-label="Image"></div> <div data-bbox="817 899 1672 979" data-label="Caption"><p>Figure 2-28. Ocean Park Public Beach Public Access Inventory The Study erroneously concludes that the Punta Las Marías lacks public access to the beach.</p></div> <div data-bbox="994 1003 1367 1026" data-label="Caption"><p>Figure 2-28. Ocean Park Beach Public Access Inventory</p></div> <div data-bbox="832 1044 1526 1270" data-label="Figure"></div> <div data-bbox="817 1288 1672 1342" data-label="Text"><p>The pubic record at the San Juan Municipality documents the quantity of public access points to the seashore.</p></div> <div data-bbox="745 1368 1672 1479" data-label="Text"><p>The real impediments to public access is not legal in nature but physical. The deplorable and dangerous condition of Calle Almendro makes access to sea level impossible. The originally fragile street structure has been destroyed by its use as a staging area for construction in a nearby property.</p></div>	

Number	Commenter	Comment	Corps Response
		<div data-bbox="817 368 1485 870"></div> <div data-bbox="817 897 1485 1399"></div> <p data-bbox="817 1427 1672 1483">The artificially hastened deterioration of the Almendro Street structure is what makes public access impossible.</p> <p data-bbox="817 1512 1672 1649">Section 3.4.3.1 Local Comprehensive Planning This section lacks any reference to applicable local comprehensive planning, locally known as “Planes Territoriales”, or Territorial Plans, prepared by each municipality. Both the island wide plans and regulations adopted for public works, shoreline delineation, Coastal Construction Control Line management, and other,</p>	

Number	Commenter	Comment	Corps Response
		<p>are also ignored. This disregard for the existing regulatory framework is an inherent weakness of the conclusions proposed in the Study.</p> <p>The only reference included in this section is to a Tetra Tech study. Tetra Tech was the group that represented a local condominium before the Puerto Rico Planning Board on the matter of the Federal Compatibility of a revetment with the Puerto Rico Coastal Zone Management Program, case number CZ-2019-0312-091, which rejected the compatibility of revetments at Playa Almendro with the Federal Puerto Rico Coastal Zone Management Program.</p> <p>Section 3.6 Summary of Management Measures: Nonstructural On page 3-8, the authors of the Study erroneously inform that the Commonwealth of Puerto Rico has not established a "Coastal Construction Control Line". This is simply not correct. Part of the achievements of the Puerto Rico Coastal Zone Management Program has been the promulgation of laws and the adoption of regulations to establish process for dealing with the maritime land zone and the relationship of new construction to this zone and the various required easements. Lacking this information, the recommendations proposed by the Study are not warranted. The inclusion in the Study of this information would require conclusions different from the ones presented.</p> <p>Section 3.6.1 Screening of Management Measures This section lists the criteria that the authors of the Study will use to evaluate all strategies for the areas under consideration. One of included criteria is to maintain the recreational use of the beaches and areas close to the coast. This criteria would suggest that an inventory of existing and potential beach facilities in the area would be an important part of the Study. Unfortunately, that inventory was not prepared, and, as matter of fact the beach at the end of Playa Almendro was not mentioned at all.</p>	


Number	Commenter	Comment	Corps Response
		<div data-bbox="817 368 1485 883"></div> <p data-bbox="817 913 1672 943">Section 3.7.1.1 Planning Reaches Selection for Formulation on Alternatives</p> <p data-bbox="817 943 1672 1054">In this section, the only option to no action alternative for Punta Las Marías is the deposit of a stone revetment in along the whole length of the segment. No reason is given why this segment cannot have a seawall, particularly as erosion is not an issue here and there are several seawall already in use.</p> <p data-bbox="817 1080 1672 1191">At least in the Coastal Zone Management case previously mentioned, the Department of Natural and Environmental Resources had rejected the use of a stone revetment and required that any new solution would need to be constructed inland of the existing seawall.</p> <p data-bbox="817 1217 1672 1328">The view of the Department of Natural and Environmental Resources expressed in the letter is counter to the new public policy the authors of this Study propose for the same area. For this reason alone, the proposal needs to be rejected and a more impartial analysis of the situation required.</p> <p data-bbox="817 1354 1672 1405">Page 3-38 Table 3-11. Comparison and Evaluation of the Final Array of Alternatives</p> <p data-bbox="817 1405 1672 1516">The two reasons given for the “functionality” of the stone revetment alternative are erosion control and attenuation of the wave action. In a preceding section (page 2-68), the “Punta Las Marías Headland” lacks erosion due to hardening of the shore.</p> <p data-bbox="817 1542 1672 1653">According to the authors of the Study, the only option to no action, for this section, is the revetment. The justification for this arbitrary conclusion is not supported by the information provided or the existing characteristics because the segment is characterized by seawalls. See Figure 2-25.</p> <p data-bbox="1656 1679 1672 1699">6</p>	

Number	Commenter	Comment	Corps Response
		<div data-bbox="832 399 1473 836"><p>Figure 2-25 San Juan Focus Areas Existing Coastal Protection</p></div> <p>Section 3.9 The Tentatively Selected Plan Contradicting the criteria announced in section 3.6.1 Screening of Management Measure, which specifically adopted the planning objective of maintaining the recreational beach use, this section indicates that this criterion was not used to evaluate alternatives chosen for the Plan. This blatant contradiction with the Coastal Zone Management Program precludes the adoption of this recommendation.</p> <p>In conclusion, if the Study had adequately recognized the existing conditions, the recommendations would have been necessarily different from those presented here. Even if the existing conditions are not taken into consideration, the selection of the revetment option as the only option that will be part of the Plan for Punta Las Marías is unwarranted by the meager information which is in fact included.</p> <p>G-K Realty respectfully requests an extension of 30 days to thoroughly submit more comments to the study.</p> <p>Sincerely,</p> <div data-bbox="1193 1378 1749 1493"> Maresa Rodriguez Portela</div> <p>Send by email PuertoRicoCoastalStudy@usace.army.mil</p>	

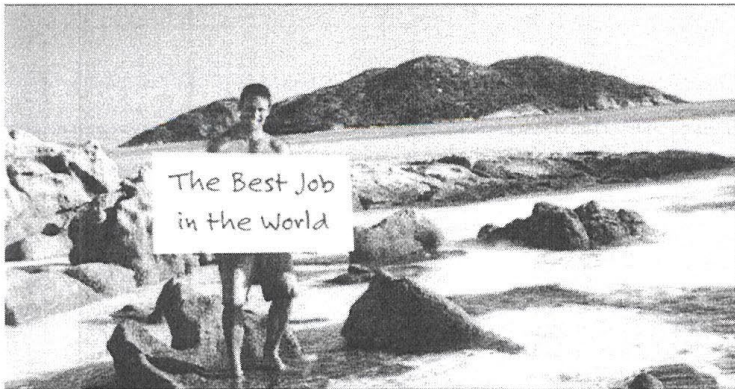
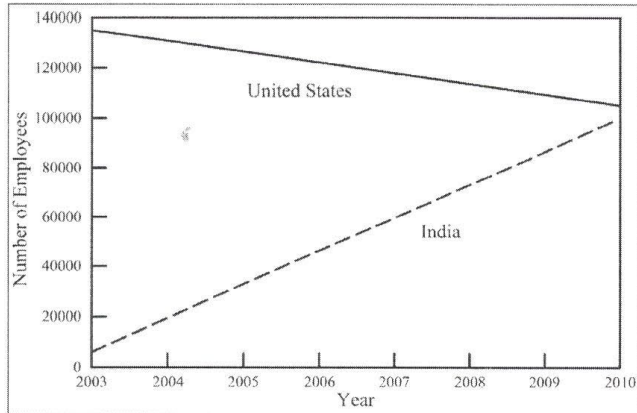
Number	Commenter	Comment	Corps Response
102	Victor Agosto Jan 5, 2021	<p>First of all, thanks for the opportunity of clarifying any question or concern regarding such an important project for Puerto Rico.</p> <p>I noticed in the document named Preliminary Report Webinar 12-2020 used for discussion at the 12-2020 webinar that it established there a sand mine located in Juncos Puerto Rico as the alternative to be used in the re-nourishment project in San Juan area. This sand mine is also confirmed in the document named Appendix D Geotechnical and I quote from the report:</p> <p>"4.3.1 SAND JUAN UPLAND SAND MINE- CONCRETOS DE PUERTO RICO, INC.</p> <p>The only currently known sand mine close to the San Juan project site is the Concretos De Puerto Rico, Inc. sand mine located in Juncos."</p> <p>Concern:</p> <p>I represent a legit sand mine located in Utuado PR. It has all sand extraction permits in place and is re-starting operation this month. Samples were taken for this project back in February 2020. No feedback or results of the lab analysis were provided. Our main objective in this communication is to secure that our sand mine is taken into consideration by USACE for any re-nourishment project in PR. I am sure that our sand quality and appearance is superior than any other upland sand mine in the island (see picture attached).</p> <p>Please reply back with some feedback and/or clarification regarding this matter. I'll be glad to answer any questions or provide more information including new samples if necessary.</p>	<p>PRIMARY CONCERN: Additional upland sand Source in San Juan</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. The team evaluated your comment and a representative from USACE and the Puerto Rico DNER visited the sand source in February 2020 and collected three representative sand samples. The samples were collected from approximately 1.0 to 2.0 foot below ground surface. The Utuado sand source is located approximately 65 Miles west of San Juan and 40 Miles east of Rincon at the outskirts of Utuado situated within the central part of Puerto Rico. Grain size analysis was performed on all three (3) samples. The granulometric data of the samples are summarized in the Geotechnical Appendix. The Utuado composite sample is characterized as poorly-graded, medium-grained silty sand (SM) with a mean grain size of or 0.63mm, 14.6% percent fines passing the #230 sieve, and light brown in color. The visual shell content of the sand is 0%, whereas the calcium carbonate content averages in 10.6%. This is an indication that the carbonate content is present in very fine-grained fractions. The silt content ranges from 10.7 to 18.3% which significantly exceeds the recommended 5% for the use as beach fill, and thus the Utuado sand source is not recommended for beach nourishment at this time.</p>
103	Maritza Caro Jan 5, 2021	<p>With all due respect for your commendable work I ask you to look for other alternatives to solve the problems in the beaches of PR. Other alternatives because we don't want the stones taking away the beaches that we have left. The government of PR is the most corrupt. Let's not allow more damage to our beaches. Our Puerto Ricans deserve to have the beaches and tourism because we depend on it. Let's look for the best to solve such problems.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
104	Diana Lopez Feliciano Jan 5, 2021	<p>Attached please find comments to the Puerto Rico CSRM Feasibility Study by Defensores Areas Costeras, Inc. (DAC)</p> <p>PDF with formal comments: "Comments Puerto Rico CSRM Feasibility Study by DAC 01-05-2021"</p>	<p>PRIMARY CONCERN: TSP in Punta Las Marias</p> <p>Response by Planning</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan with updated information about existing conditions.</p> <p>A revetment is no longer being proposed on Punta Las Marias. Erosion was assessed but was found to have seasonal shifts in sand, and damages to structures from erosion was found to be at lower risk than damages from coastal flooding. The tentative plan in Ocean Park planning reach, which includes Punta Las Marias, will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features.</p>

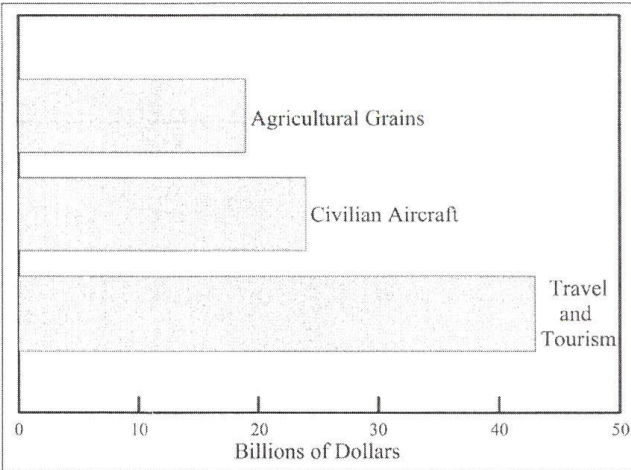

Number	Commenter	Comment	Corps Response
		<p style="text-align: center;">DIANA LÓPEZ–FELICIANO ATTORNEY AT LAW</p> <p>diana@lopezfeliciano.com Tel. (787) 622-3777 Fax (787) 622-3778</p> <p style="text-align: right;">Midtown Bldg., Ste. 604 420 Ponce de León Ave. S. J., P. R. 00918-3406</p> <p>January 5, 2021</p> <p>Colonel Andrew D. Kelly, Jr. District Commander Corps of Engineers, Jacksonville District Department of the Army PuertoRicoCoastalStudy@usace.army.milby</p> <p>Re: Puerto Rico Coastal Study Draft Integrated Feasibility Report and Environmental Assessment</p> <p>TO THE DISTRICT COMMANDER:</p> <p>I write on behalf of Defensores Areas Costeras, Inc., (DAC) a non-governmental (non-profit) organization founded for the protection of the coasts of Puerto Rico. DAC's members are mostly part of the community of Punta Las Marías, one of the planning reaches identified in the <i>Puerto Rico Coastal Study, Draft Integrated Feasibility Report and Environmental Assessment</i>.</p> <p>Since 2000, DAC has represented the community of Punta Las Marías, and due to its intervention in several projects endangering its coast, it is a well-known NGO known by local and federal agencies. But DAC nor the community were notified of the study. It is regretful to learn that the report mentions incorrectly that the community was notified of the study.</p> <p>Unfortunately, DAC was not aware of the study by the COE until two days ago by means of a newspaper article in the <i>El Nuevo Día</i> mentioning a 1,400 feet revetment of rocks in the West side of Punta Las Marías' coast, pursuant to a report issued by the COE, and which provides until January 6, 2021 for submitting comments. Very prejudicial for the community of Punta Las Marías to be unable to thoroughly review the report and submit comments in a short period of time.</p> <p>DAC respectfully requests an extension of time to thoroughly consider the report and to submit comments to the study that proposes the elimination of several beaches in the West side of Punta Las Marías' coast without considering the community's opposition and other data showing why it is an action contrary to the community and to the environment.</p>	<p>There is a new 30-day review public period for this re-release of the draft report. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.</p>


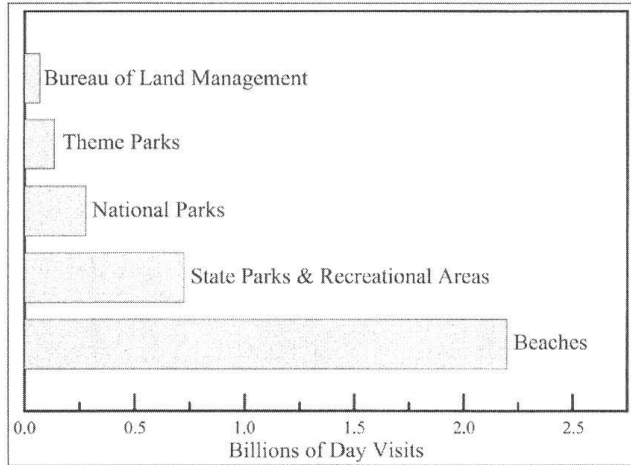
Number	Commenter	Comment	Corps Response
		<p>The report indicates in several sections that there are several studies and analysis undergoing and omitted in the report but, that will be addressed in the final report. Nonetheless, the Executive Summary indicates that the “study team will produce both a draft and a final report, which will be available for review.” [ES-1]</p> <p>DAC respectfully requests the public review of an updated version of the draft with the omitted data, before the final report is produced. It is in the best interests of the COE to consider the community’s position since the report states that its objective is to protect the property in the community of Punta Las Marías. Not to mention that the due process of law provides for the public review of an updated version.</p> <p>The extension of time is needed to address a very prejudicial project to the public interest. The extension of time is not prejudicial to the COE.</p> <p>Hereinafter several brief comments as to the draft report.</p> <p>Punta Las Marias has two seasonal beaches for the use of the community, the public, and the tourists. Each at the end of Almendro and Doncella streets. Contrary to the report, there are no blocked access points. The beaches and the coast at the end of each of the streets in Punta Las Marías are accessible to the public. Act Number 21, May 20, 1987, expressly requests public access to the coast during the hours of the day, allowing property owners only denying access during the night by means of its gates.</p> <p>The report lacks to consider the negative economic effect of eliminating the beaches in the West side of Punta Las Marías with the proposed deposit of the rocks. Beaches are one of the main resources of the economy in the world industry of Travel and Tourism, also identified key factor in the economy of United States. See attached article by J.R. Houston, of the U.S. Army Engineering Research and Development Center, "The economic value of beaches -- a 2013 Update." Shore & Beach 81(1), p.5.</p> <p>Therefore, the elimination of the beaches in the West side of Punta Las Marías with the revetment of rocks is contrary to the objective identified in the study of “maintain recreational use of beach”, the “Secondary Objective” identified in the report. Also, contrary to the “Opportunity” identified in the report as to “maintaining existing recreation and tourism.”</p> <p>The Executive Summary states:</p> <p><i>The single purpose of his study is to determine whether there is economic justification and Federal interest in a plan to reduce damages to properties and infrastructure as a result of erosion, wave attack and flooding from coastal storms and hurricanes along specific areas of Puerto Rico coastline.</i></p> <p>Therefore, its main goal is to reduce damages from coastal storms and hurricanes, as those identified by the Department of Natural and Environmental Resource after hurricane María in 2017. [ES-1]</p>	

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		<p>The report states that it assessed approximately 30 miles of coastline island-wide, but most areas were “eliminated based on lack of potential for economic justification.” [ES-1]</p> <p>It further states that during plan formulation, other areas were screened out and, the investigation led to only four planning reaches in San Juan (Condado Pocket Beach, Punta Piedrita Headland, Ocean Park Pocket Beach, West side of Punta Las Marías); and one planning reach in Rincón.</p> <p>Of all the beaches in San Juan, the only beaches to be eliminated with a revetment of rocks are two pocket beaches in the West side of Punta Las Marías. The elimination of these two beaches lack justification.</p> <p>The revetment of rocks in the West side of Punta Las Marías is to allegedly protect the properties but the report:</p> <ol style="list-style-type: none">1) Does not consider and discuss the existing coastal protection (seawall and/or stone revetment) of all the properties in the coastline of the West side of Punta Las Marías. Therefore, no need for protection if the properties have coastal protection.2) Does not consider that all the properties in the coastline of the West side of Punta Las Marías have coastal protection. <p>Further, the report does not comply with the environmental compliance required by the <i>National Environmental Protection Act</i>. Besides lack of consideration of the existing coastal protection in all the coastline properties in the West side of Punta Las Marías, it also fails to consider:</p> <ol style="list-style-type: none">1) The social, cultural, recreational, and economic values of the beaches in the West side of Punta Las Marías to the community, the public and to tourists.2) The alternative of reinforcing the existing natural reef in the ocean North of the coast that for decades has protected the coast from the coastal storms and hurricanes.3) The alternative of a submerged breakwater/artificial reef. <p>Besides considering the aforementioned, an extension of thirty (30) days is requested to thoroughly consider the report and to submit comments.</p> <p>Sincerely,</p>  <p>DIANA LÓPEZ-FELICIANO</p>	

Number	Commenter	Comment	Corps Response
		<div> <div> </div> <div> <p>The economic value of beaches — a 2013 update</p> <p>By James R. Houston <i>U.S. Army Engineer Research and Development Center 3909 Halls Ferry Road, Vicksburg, MS 39180 james.r.houston@usace.army.mil</i></p> <hr/> <p>ABSTRACT</p> <p>Few Americans are aware that the travel and tourism (T&T) industry is among America's largest industries, employers, and earners of foreign exchange; and beaches are its leading tourist destination. In an era where the availability of jobs is a major issue and their offshoring a significant concern, the T&T industry is the largest employer in the U.S. and its jobs are difficult to offshore. U.S. economic competitiveness is of concern, since it runs large trade deficits, but its largest trade surplus is in T&T, where it runs a multi-billion-dollar surplus even with China. Survey after survey finds that beaches are the leading U.S. vacation destination. However, beach erosion is a major concern for many beaches. As beaches such as Waikiki decrease in width tourists head to other destinations, including foreign beaches. Beach nourishment has been shown to increase tourist numbers and provide a good return on investment, in particular to the federal government through taxes. However, the U.S. lags much of the world in the growth of tourism infrastructure investment including restoration of beaches. As a result, the growth of U.S. tourism is projected to lag much of the rest of the world. Renewed U.S. investment in tourism infrastructure is important to grow the economy and number of jobs and to reduce the U.S. trade imbalance.</p> <hr/> <p>Houston (1995a; 1996; 2002; 2008) described the economic value of America's beaches. He noted that the travel and tourism (T&T) industry is becoming increasingly dominant in economies throughout the world. However, few realize that T&T is among America's largest industries, employers, and earners of foreign exchange; and beaches are its leading tourist destination. Although high-technology industries grab the news, the U.S. runs a trade deficit in these industries and high-technology jobs are increasingly "offshored" in today's world economy. T&T is difficult to offshore and is providing the economic growth, jobs, and foreign exchange that make the U.S. competitive in a world economy. However, tourists have choices in international tourism, and the U.S. has neglected tourism including supporting infrastructure investments. This paper updates and lends support to the conclusions of Houston (1995a; 1996; 2002; 2008) on the economic importance of beaches to the national economy.</p> <p>T&T AND THE ECONOMY</p> <p>T&T is the world's largest industry, contributing \$6.3 trillion in 2011 to the world's Gross Domestic Product (GDP) (World Travel and Tourism Council 2011a) and exceeding the GDP of all countries other than the United States (United Nations 2010). Similarly, T&T contributes \$1.3 trillion to America's GDP (World Travel and Tourism Council 2011b). This is 8.7% of U.S. output and makes it the third largest contributor to GDP behind real estate rental and leasing (12.6%) and manufacturing (11.7%) (U.S. Bureau of Labor Statistics 2012a; World Travel and Tourism Council 2011b). T&T also produces \$124 billion in annual tax revenue for all levels of government in the United States; without this revenue, each U.S. household would pay \$1,055 more in taxes (U.S. Travel Association 2012).</p> <p>T&T MEANS JOBS IN AMERICA</p> <p>T&T is both the world's and America's largest employer (Figure 1) providing 255 million jobs throughout the world (8.7% of jobs) and 14.3 million jobs in the U.S. (10.2% of total employment)—more than one out of every 10 jobs (U.S. Bureau of Labor Statistics 2012b, World Travel and Tourism Council 2011a). In contrast, all U.S. manufacturing industries from Apple to General Motors to Boeing employ only 12.0 million people, having steadily lost 3.2 million jobs in the past 10 years (U.S. Bureau of Labor Statistics 2012c). States compete with each other to attract manufacturing industries, especially high-technology industries, but few have policies to attract T&T businesses. However, the number of high-tech U.S. manufacturing jobs declined almost 30% from 2000 to 2010 with only 1.8 million remaining; about one-eighth the number of T&T jobs (Washington Post 2012). For example, Figure 2 shows employment trends at IBM that currently has less than a quarter of its employees located in the U.S. Since 2004, about 85% of R&D employment growth in U.S. multinational corporations has been abroad (Trade Reform 2012).</p> <p>Not only are manufacturing jobs in a long-term decline, but many service-sector jobs face "offshoring." Princeton economist Alan Blinder, who was vice chairman of the Federal Reserve during the Clinton administration, says that 25% of American service-industry jobs are at risk of being offshored (Blinder 2009). T&T is a rare industry where offshoring is difficult. There can be intense competition among countries for tourism, but if a tourist wants the tourist experience at Fisherman's Wharf in San Francisco, the tourist has to go to San Francisco. In the current tough economic times, Adrian Cooper, chief executive of Oxford Economics, recently said of T&T: "It's one of the healthiest sectors in the United States ..."⁴ (New York Times 2012b).</p> <p>T&T IS KEY TO INTERNATIONAL COMPETITIVENESS</p> <p>The U.S. is a major player in the international T&T industry. International tourists, who represent 10%-15% of tourists in the U.S., spent \$153 billion in 2011, a</p> </div> </div> <div> <p>Shore & Beach ■ Vol. 81, No. 1 ■ Winter 2013</p> <p>Page 3</p> </div>	


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		<div><p>Figure 1. Travel and tourism is America's leading employer.</p><p>Figure 2. Number of IBM employees in the U.S. and India (New York Times 2012a; Computerworld 2010).</p><table><caption>Estimated data for Figure 2: Number of IBM employees</caption><tr><th>Year</th><th>United States</th><th>India</th></tr><tr><td>2003</td><td>135,000</td><td>10,000</td></tr><tr><td>2004</td><td>130,000</td><td>15,000</td></tr><tr><td>2005</td><td>125,000</td><td>20,000</td></tr><tr><td>2006</td><td>120,000</td><td>25,000</td></tr><tr><td>2007</td><td>115,000</td><td>30,000</td></tr><tr><td>2008</td><td>110,000</td><td>35,000</td></tr><tr><td>2009</td><td>108,000</td><td>40,000</td></tr><tr><td>2010</td><td>105,000</td><td>100,000</td></tr></table><p>14% increase over 2010, and growth in 2012 has been rapid and is estimated to total about \$170 billion (Brand USA 2012; U.S. Department of Commerce 2011). This is greater than the combined value of exports in the few areas where the U.S. has significant exports — agricultural grains, aircraft, computers, and telecommunications equipment (U.S. Census Bureau 2012). The U.S. ran a trade deficit of \$727 billion in 2011 but, in contrast, T&T was one of the few bright spots of trade with international tourists spending more in the U.S. than U.S. tourists spend abroad, resulting in a trade surplus of \$43 billion (U.S. Department of Commerce 2011). T&T has the largest surplus of any trade category, being greater than the U.S. trade surplus of \$19 billion for all agricultural products and \$24 billion for civilian aircraft as seen in Figure 3 (U.S. Department of Commerce 2011). The U.S. even had a T&T trade surplus of \$4.4 billion with China (U.S. Department of Commerce 2011). Americans take pride in U.S. high-technology industries, but the U.S. ran a trade deficit in high-technology goods of almost \$100 billion in 2010 (National Science Foundation 2012). This deficit has quadrupled since 1998, whereas exports of high-technology goods by China, India, and countries in Southeast Asia have increased during the same timeframe from \$75 billion to \$375 billion annually (National Science Foundation 2012).</p><p>International tourists visiting the U.S. produced estimated tax revenues in 2011 of \$17 billion (U.S. Travel Association 2009; U.S. Department of Commerce 2011). The federal government receives 56% of tax revenues from domestic T&T, and state and local governments receive 28% and 17% respectively, despite local governments providing much of the tourist-support infrastructure (U.S. Travel Association 2009). Assuming the federal government receives the same percentage of taxes from international as domestic tourists, it received \$9.5 billion in taxes from international tourists in 2011.</p><p>BEACHES ARE KEY TO U.S. T&T</p><p>Beaches are the key element of U.S. T&T, since they are the leading tourist destination (Figure 4). A survey by Trip-Advisor (2011) of planned 2012 travel found that beaches are the leading U.S. tourist destination with 44% of survey respondents planning beach vacations. An ABC/Washington Post poll (ABC/Washington Post 2012) found beaches the most popular summer vacation destination with 72% of Americans expressing a favorable opinion of going to the beach for summer vacation. Further, they found Americans spend a full 40% of their allotted vacation days at the beach and 52% of respondents planned to holiday at the beach in the next 12 months. Beaches have long been considered the number one family vacation destination, but Match.com (2012) reports that 72% of singles say the most important factor in choosing a summer travel destination is a beautiful beach. Going to beaches is not just an American obsession. Expedia.com (2012) found in a survey of 8599 adults in 21 countries that "... the beach is by far the favorite destination for the majority of the world's travelers."</p><p>Klein <i>et al.</i> (2004) performed a detailed analysis of tourism in the U.S. and concluded there was "...strong evidence for the unique quality of the coastal zone as a magnet for tourism." Indeed, coastal states receive about 85% of tourist-related revenues in the U.S. largely because beaches are tremendously popular (World Almanac 2012). Although there are many interior attractions from Yellowstone to the Grand Canyon and from Las Vegas to Branson, Missouri; the popularity of beaches dominates tourism. For example, Venice Beach, California, has 16 million tourist visits annually (<i>Travel and Leisure</i> 2012). This is almost 50% more visits than the combined visits to Yellowstone</p></div>	Year	United States	India	2003	135,000	10,000	2004	130,000	15,000	2005	125,000	20,000	2006	120,000	25,000	2007	115,000	30,000	2008	110,000	35,000	2009	108,000	40,000	2010	105,000	100,000	
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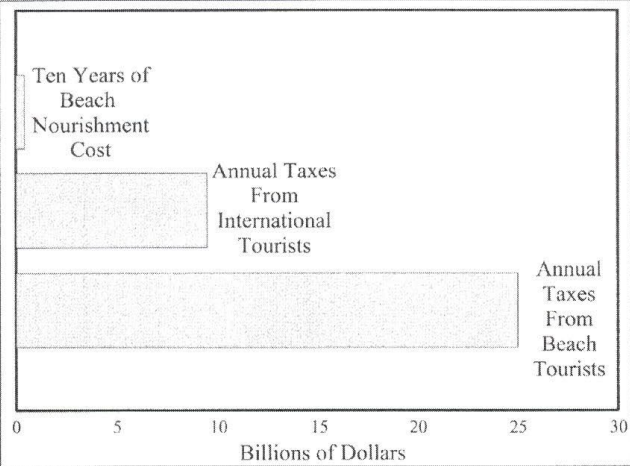

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		<p>(3.3 million), Yosemite (4.0 million), and the Grand Canyon (4.4 million) (National Park Service 2012a). California beaches alone had 659 million day visits in 2001 (California Department of Boating and Waterways and State Coastal Conservancy 2002) or 720 million in 2010 if adjusted for U.S. population growth (U.S. Census Bureau 2011). This compares with day visits of 280 million to all 388 National Park Service properties — including national seashores and monuments and buildings such as the Lincoln Memorial, Washington Monument, and White House (National Park Service 2012b). It is estimated that in 2001, approximately 180 million Americans made 2 billion visits to ocean, gulf, and inland beaches (Clean Beaches Council 2012). Assuming beach visits increase in proportion to increasing population, about 200 million Americans made 2.2 billion visits to beaches (Figure 5) in 2010 (U.S. Census Bureau 2011). As seen in Figure 6, this is twice as many visits as the combined 1.08 billion visits made to properties of the National Park Service (280 million), Bureau of Land Management (70 million), and all state parks and recreation areas (725 million) (National Association of State Park Directors 2012; Bureau of Land Management 2012). Moreover, many of these visits to state parks and recreation areas were visits to beaches. For example, state beaches in California account for only 2.7% of California state park holdings, but account for 72% of visits (King 1999). The 2.2 billion beach visits also dwarf the 137 million visitors to the top 20 theme parks in the U.S. in 2010 including properties of Disney, Universal, Six Flags, SeaWorld, Busch Gardens, Knotts Berry Farms, Hershey Park, Dollywood, and other theme parks (Themed Entertainment Association 2012).</p> <p>Beaches make a large contribution to America's economy. Beach tourism in Florida made a contribution in 2005 of over \$60 billion to its economy in 2012 dollars (Murley <i>et al.</i> 2005; U.S. Bureau of Labor Statistics 2012d). Similarly, King (1999) shows that California beach tourism made a contribution in 1998 of \$73 billion to the state and national economy in 2012 dollars. Multiplying the ratio of visitors to national beaches (2.2 billion) and visitors to California beaches (720 million) by the contribution of California beach visitors to the national</p> <p>Figure 3. U.S. trade surplus among the few areas where exports exceed imports.</p>  <table><tr><th>Category</th><th>Billions of Dollars</th></tr><tr><td>Agricultural Grains</td><td>~18</td></tr><tr><td>Civilian Aircraft</td><td>~25</td></tr><tr><td>Travel and Tourism</td><td>~42</td></tr></table> <p>economy (\$73 billion) in 1998 yields an estimate that U.S. beaches currently contribute about \$225 billion annually to the national economy in 2012 dollars (King 1999; Clean Beaches Council 2012; and U.S. Bureau of Labor Statistics 2012d). This is seven times the \$31 billion contribution of the National Park Service system to the national economy (U.S. Department of the Interior 2012). Moreover, beach tourism contributes significant tax revenue to the federal government. Beach tourists in California paid an estimated \$8.1 billion in federal taxes in 2002 (California Department of Boating and Waterways and State Coastal Conservancy 2002). Again, taking the ratio of beach visits nationally to those in California and converting to 2012 dollars, beach visitors contribute about \$25 billion in federal tax revenue annually.</p> <p>BEACH RESTORATION PROVIDES A STRONG ECONOMIC RETURN</p> <p>Beach erosion is the No. 1 concern that beach tourists have about beaches (Hall and Staimer 1995). With about 20,000 mi of eroding shoreline and 2,700 mi of critically eroding shoreline (U.S. Army Corps of Engineers 1994), beach erosion is a serious threat to the nation's beach tourism and, therefore, a threat to the national economy. Restoring beaches through beach nourishment can greatly increase their attractiveness to tourists. For example, in 1989, 74% of those</p> <p>polled in New Jersey said the New Jersey shore was “going downhill.” By 1998, only 27% thought the New Jersey shore was in decline, with 86% saying that the shore was one of New Jersey’s best features (Zukin 1998). The difference between 1989 and 1998 was construction of the beach nourishment project from Sandy Hook to Barnegat Inlet, New Jersey, which is the largest beach nourishment project (in terms of volume) in the world (U.S. Army Corps of Engineers 2001). This project not only brought in tourists, but provided critical protection during Hurricane Sandy. After a tour of damage along the New Jersey from Hurricane Sandy, New Jersey Governor Chris Christie said: “If you look at the towns that have had engineered beaches, up and down the state, those are the towns whose damage was minimal. Other towns that didn’t, the damage was much greater. I</p> <p>Figure 4. Beaches are America's leading tourist destination.</p> 	Category	Billions of Dollars	Agricultural Grains	~18	Civilian Aircraft	~25	Travel and Tourism	~42	
Category	Billions of Dollars										
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		<div><p>Figure 5. Some of the 2.2 billion annual beach visits.</p><p>Figure 6. Day visits to beaches compared with day visits to the other major tourist attractions in the United States.</p><table><tr><th>Attraction</th><th>Billions of Day Visits (approx.)</th></tr><tr><td>Bureau of Land Management</td><td>0.1</td></tr><tr><td>Theme Parks</td><td>0.2</td></tr><tr><td>National Parks</td><td>0.4</td></tr><tr><td>State Parks & Recreational Areas</td><td>0.8</td></tr><tr><td>Beaches</td><td>2.2</td></tr></table><p>think that's a lesson for us as we move forward." (NJ.com, 2012)</p><p>A study of beach tourism in Florida (Klein and Osleeb 2010) concluded that beach nourishment projects can have a "dramatic impact on the tourism sector." The impact was seen in "... visible discontinuities and increases in the slope in ... tourism-sector earnings" after beach nourishment. They noted that tourism earnings at Miami Beach increased 56% the year after completion of the beach restoration project. This one-year increase in tourism income of \$290 million was more than five times the \$51 million cost of the beach nourishment (Wiegel 1992).</p><p>Miami Beach is a good example of the economic benefits of beach restoration. Miami Beach had virtually no beach by mid-1970 (Figure 7). As a result, facilities were run down, and Miami Beach was not the place to visit. By 1977, <i>Time</i> magazine (1977) reported: "So rapidly has the seven-mile-long island degenerated that it can be fairly described as a seedy backwater of debt-ridden hotels." Beach nourishment in the late 1970s rejuvenated Miami Beach and opened its beaches to the public (Figure 8). Beach attendance, based on lifeguard counts and aerial surveys, soared from 8 million in 1978 to 21 million in 1983 (Wiegel 1992). The federal government paid 58.7% of the cost of the beach nourishment, or about \$30 million, and the Corps of Engineers estimated the annual capitalized cost of the project was \$2.78 million with a federal share of \$1.6 million (Wiegel 1992). In 2011 tourists contributed \$13 billion to the Greater Miami economy with 44% of these tourists staying at Miami Beach and accounting for a proportionate \$5.7 billion to the Miami Beach economy (Greater Miami and the Beaches, 2012). International tourists make up 48% of all overnight visitors, and, since they spend more than domestic tourists, contribute at least \$2.9 billion to the Miami economy (Greater Miami and the Beaches 2012). Thus, international tourists alone make an annual contribution to the economy of Miami Beach that is over 50 times the cost of the \$51 million Miami Beach nourishment project and over 1,000 times its annual cost. In addition, the U.S. receives over \$1,800 in foreign exchange (\$2.9 billion) annually at Miami Beach for every \$1 of its share of the annual cost of the beach nourishment (\$1.6 million). This compares, for example, with a return of less than \$3 in corn trade surplus (\$13.7 billion) for each \$1 (\$4.6 billion) of crop subsidy. The \$4.6 billion in crop subsidy goes to 52 recipients, who then each receive an average annual corn subsidy payment over 50 times the federal government's annual share of the cost of the Miami Beach nourishment project (Environmental Working Group 2012).</p><p>It is instructive to compare the federal investment in beach infrastructure (beach nourishment) versus federal tax revenues from tourists. From 1950-1993 the federal government and its cost-sharing partners spent an average of \$34 million in 1993 dollars (\$54 million in 2012 dollars) annually on beach nourishment (U.S. Army Corps of Engineers 1994). Starting in the mid-1990s, the federal investment increased to about \$100 million a year (Mar-</p></div>	Attraction	Billions of Day Visits (approx.)	Bureau of Land Management	0.1	Theme Parks	0.2	National Parks	0.4	State Parks & Recreational Areas	0.8	Beaches	2.2	
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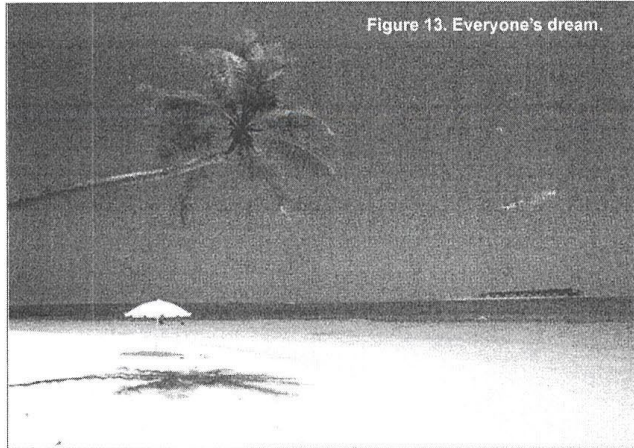
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		<p>lowe 1999), but then declined to a 2012 funding of only \$44 million (American Shore and Beach Preservation Association 2012). As shown earlier, beach tourists provide about \$25 billion in annual federal tax revenue. Therefore, for every \$1 the federal government spent on beach nourishment in 2012 (\$44 million), it collected about \$570 (\$25 billion) annually in tax revenues from beach tourists. Also shown earlier was that international tourists provide about \$9.5 billion in annual federal tax revenue. Thus, international tourists annually provide about \$215 in tax revenues for every \$1 the federal government spends on beach nourishment. Figure 9 compares what the federal government would spend in 10 years on beach nourishment at the 2012 rate (the one-year cost would be too small to see on the plot) versus tax income from international and beach tourists.</p> <p>With almost eight times as many annual beach tourist visits (2.2 billion) as visits to all properties of the National Park Service (280 million), the recreational value of beaches is clear. However, the 2012 federal investment in beaches of \$44 million is less than 1.4% of the \$3.1 billion budget of the Park Service (National Park Service 2012c), which critics maintain is itself inadequate. The National Parks Conservation Association asserts that national parks are underfunded by \$500 million to \$600 million annually, have a \$10.8 billion backlog of needed maintenance, and 85% of those surveyed say parks should have sufficient funding to fully restore them (National Parks Conservation Association 2012). Similarly, many beach visitors would agree with Congressman Frank Pallone Jr. from New Jersey, who noted: "In the same way we look at our national parks as a national treasure, we should look at our beaches as a national treasure" (<i>New York Times</i> 2007).</p> <p>For federal involvement in water resource projects, the Office of Management and Budget (OMB) requires the Corps of Engineers use a National Economic Development (NED) criterion for evaluating projects. This criterion assumes "full employment of the nation's resources." In the case of beach nourishment, OMB chooses to interpret the NED criterion as meaning that full employment of the nation's resources implies that any new economic activity within a beach community can only occur at the cost of economic activity elsewhere</p> <p>in the nation, so there is no net national economic gain due to beach restoration (Robinson, 2002).</p> <p>King and Symes (2003) assert that OMB's policy unduly limits the federal interest in California's beaches. They examine OMB's assumption that visitors who decide not to recreate on California's beaches will spend their dollars elsewhere in the U.S., creating no net economic or tax impact for the federal government. They determined there is a significant net loss to the state of California and the federal government from a failure to maintain California's beaches. Surveying 2,719 households in southern California and extending the analysis to all California beaches, they concluded that: "...a significant number of beach visitors would, in fact, travel outside of California and outside of the U.S. if there were no beaches in California." If California beaches were unavailable for recreation, they estimate that beach goers would instead spend about \$3.1</p>  <p>Figure 7. Miami Beach before and after beach nourishment.</p>  <p>Figure 8. Miami Beach today.</p> <p>Shore & Beach ■ Vol. 81, No. 1 ■ Winter 2013</p> <p>Page 7</p>	

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		<div><div><p>Figure 9. Ten years of federal beach nourishment costs at the 2012 rate versus annual federal revenues from international tourists and beach tourists.</p><p>Figure 10. Nourished beach in Spain.</p></div><div><p>billion in other states and \$2.4 billion outside the United States. King and Symes (2003) use standard techniques from the federal Bureau of Economic Analysis to show that the unavailability of California beaches would produce an annual economic loss to the California economy of \$8.3 billion and there would be a further loss of \$6 billion to the U.S. national economy. They note that the state of California and federal government would lose \$761 million and \$738 million respectively in taxes. With the annual federal cost of shore protection in California beaches ranging between \$12 million and 18 million, for every \$1 of</p><p>federal expenditures on shore protection for California, the federal government avoids tax losses of \$41 to \$62.</p><p>Current OMB policy relegates recreation projects to a lower priority than navigation, flood control, and environmental restoration projects. In fact, beach restoration projects that would have a large positive economic impact on tourism revenues have to be primarily justified on reduction of storm damage, with recreational benefits not permitted to account for half or more of the benefits. Relegating recreation to a lower priority than navigation is an example of thinking</p><p>locked in the past. For example, OMB assigns a high priority to a dredging project on the U.S. Pacific coast when its net effect is to allow Pacific Rim countries such as China to import products into the U.S. more cheaply, since the U.S. imports more products from these countries than it exports. Cheaper products are a value to consumers, but their importation increases the U.S. trade deficit and reduces the number of U.S. jobs. Recreation projects not only create jobs to support domestic tourists, but jobs to support foreign tourists as well. Over 90% of the benefits of the Miami Beach nourishment were recreational benefits, so the project would not have proceeded with current OMB policies (Wiegel 1992). Yet foreign tourists spend \$2.9 billion annually at Miami Beach, over 1,800 times the federal government's share of the annual cost of the nourishment. Inclusion of recreational benefits in Corps of Engineers projects would produce significant benefit/cost ratios and lead to more U.S. jobs.</p><p>WORLDWIDE COMPETITION FACING U.S.</p><p>Houston (1996) noted that T&T's importance to world economies, employment, and international competitiveness has not been lost on America's economic competitors. Germany and Japan have out spent the U.S. in infrastructure investment for decades including spending freely to maintain their beaches as infrastructure investments. For example, Germany spent about \$3.3 billion over 40 years on shore protection to protect a coastline less than 5% the length of the U.S. coast (Kelletat 1992). This is about five times corresponding U.S. expenditures over the same period, 25 to 50 times a greater share of GDP, and 500 to 1,000 times the GDP per mile of coast (Houston 1995b). Japan's budget for shore protection and restoration has topped \$1.5 billion in a single year (Marine Facilities Panel 1991). This is more spent in a single year than the U.S. spent in over 40 years from about 1950 to 1990 (U.S. Army Corps of Engineers 1994). Spain with its extensive beaches is a major tourism competitor for the U.S. It conducted a five-year program in the early 1990s to both restore existing beaches and build new ones and spent more than the U.S. spent for beach restoration over 40 years (Figure 10) (Ministerio de Obras Publicas y Transportes 1993). The wisdom of the</p></div></div>	





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		<p>extensive beach restoration in Spain is seen in the fact that currently tourism is the only booming part of a dismal Spanish economy (Riggins 2012). Almost 90% of international tourists to Spain choose coastal regions for their vacations (Yepes and Medina 2005).</p> <p>U.S LOSING LEAD</p> <p>In the early 1990s the U.S. was dominant in world T&T. The U.S. Travel and Tourism Administration (1993) noted: “There is probably no country in the world that has a greater comparative advantage in tourism than the United States.” <i>The Wall Street Journal</i> (1994) noted the U.S. domination of world T&T, saying the U.S. received over 45% of the developed world’s travel-and-tourism revenues and 60% of its profits. However, Congress in 1996 abolished the U.S. Travel and Tourism Administration, whose primary function was marketing U.S. tourism internationally. The National Oceanic and Atmospheric Administration (1998) noted as a result of the abolishment: “The U.S. is (the) only country in the developed world without a government-funded National Tourism Office and (it) bodes badly for the country’s future tourism growth.”</p> <p>The decline of the U.S. T&T industry started playing out in earnest in the 1990s as America’s share of the global inbound tourism market dropped 35% from 1993 to 2005. The U.S. lost 18% of its international market share in just five years from 2000 to 2005. The significant drop in international tourists cost the American economy \$286 billion from 1993 to 2005 including \$44 billion in 2005 (National Tour Association 2007). The U.S. share of the global travel market decreased precipitously from 17.3% in 2000 to 11.2% in 2010 (National Tour Association 2012).</p> <p>There is a world economy in tourism that gives consumers ample choices and produces stiff worldwide competition for tourists. If Florida beaches become run down, German tourists can choose Spanish beaches. If Hawaiian beaches decline, Japanese tourists can choose Australia’s Gold Coast beaches that have been rejuvenated. In fact, there is evidence that international tourists are shifting away from the U.S. For example, Waikiki beaches are severely eroded, and the number of international visitors to Hawaii is lower in 2010 than in 1988 (State of</p>   <p>Hawaii 2012). In contrast, Queensland, the location of Australia’s Gold Coast, has pulled even with Hawaii in the number of international tourists with each having about 2 million annually (Figure 11) (Tourism Queensland 2012). Hawaii was spurred into action to address the eroding Waikiki beaches when a study showed that if Waikiki were allowed to continue eroding away, there would be an annual loss in tourist revenues of \$2 billion and tax revenues of \$150 million (Hawaii Tourism Authority 2012).</p> <p>This worldwide competition is well recognized outside the U.S. For example, Houston (1996) noted that in the mid-1990s the U.S. spent only \$16 million in advertising to international tourist markets, and this compared to Spain’s \$170 million in advertising (<i>Washington Post</i> 1995). At the time, the U.S. ranked 33rd in the world in international tourism advertisement, trailing Malaysia and Tunisia, (Brooks 1995) and spending less than 4% of what Greece spent (Figure 12) and 5% of what Spain spent (National Tour Association 2007). However, even this minimal U.S. spending on advertisement to international tourist markets was eliminated when Congress abolished the U.S. Travel and Tourism Administration in 1996. The U.S. then had no nationally-funded tourism advertising while countries such as Australia, Canada, France, Greece, Singapore, and Spain each spent \$100 million or more annually in the</p> <p>1990s on international marketing (Brooks 1995; Hotel-online 1998; Balzer 1998). The U.S. started to recognize that its neglect of T&T was hurting its economy and passed the Travel Promotion Act of 2010. This Act initiated in 2012 the Brand USA public/private partnership, which has the mission of promoting increased international travel to the U.S. (Brand USA 2012).</p> <p>THE FUTURE</p> <p>The future of T&T in the U.S. is not rosy as a result of its lack of investment. The U.S. ranks 133 in the world in the growth of T&T infrastructure investments (World Travel and Tourism Council 2007). As a result, it ranks 128 of 181 countries in expected T&T growth in 2012 and is forecast to rank 132 from 2012 to 2022 (World Travel and Tourism Council 2011a), lagging countries such as Namibia, Azerbaijan, Kyrgyzstan, and Zambia, which have few tourist attractions (World Travel and Tourism Council 2012).</p> <p>CONCLUSIONS</p> <p>T&T is among America’s leading industries, employers, and earners of foreign exchange; and beaches are America’s leading tourist destination (Figure 13). Few Americans realize that beaches are a key driver of America’s economy and that they support U.S. competitiveness in a world economy. Perhaps Americans do not appreciate the importance of</p> <p>Shore & Beach ■ Vol. 81, No. 1 ■ Winter 2013</p> <p>Page 9</p>	




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		<div><div></div><div><p>Figure 13. Everyone's dream.</p></div><div><p>tourism to the national economy because 98% of the 1.4-million tourism-related U.S. businesses are classified as small businesses, and this makes the industry extremely fragmented (U.S. Travel and Tourism Administration 1993). Lacking national advertising from either this fragmented industry, or until recently a national travel office, the importance of T&T to the national economy has not been communicated to the American people. The conclusion one draws today is the same as that noted by Houston (1995a): "Without a paradigm shift in attitudes toward the economic significance of travel and tourism and necessary infrastructure investment to maintain and restore beaches, the U.S. will continue to relinquish a dominant worldwide lead in its most important industry."</p><p>ACKNOWLEDGEMENTS</p><p>I appreciate the both the review of this paper by Bob Dean and the encouragement he provided me to write the original and update papers. I also appreciate the reviews by anonymous reviewers and the editor that improved the paper.</p></div><div><p>REFERENCES</p><p>ABC/<i>WashingtonPost</i> 2012. "Summer Vacation Perennial The Mountains or the Beach?" http://www.langerresearch.com/uploads/1127a31FavorabilityNo31.pdf.</p><p>American Shore and Beach Preservation Association 2012. "Obama Budget a Disappointment to National Coastal Advocacy Group." http://www.asbpa.org/pdfs/ASBPAPress%20Release_Feb142011.pdf.</p><p>Balzer, S., 1998. "Congress weighs \$100M dowry for U.S. tourism." <i>The Business Journal</i>, http://phoenix.bcentral.com/phoenix/stories/1998/08/17/story7.html.</p><p>Blinder, A.S., 2009. "On the measurability of off-shorability." http://voxeu.org/article/twenty-five-percent-us-jobs-are-offshorable.</p><p>Brand USA 2012. "Tourism Remains an Economic Bright Spot: International Traveler Spending On Pace for A Record Year." http://www.thebrandusa.com/press-releases/eContent.asp?pg=Tourism Remains an Economic Bright Spot: International Traveler Spending On Pace for A Record Year&content=119&cat=16.</p><p>Brooks, B., 1995. Interview with Professor Robert Bryer, Florida State School of Business. <i>Florida State Times</i>, http://www.fsu.edu/~fstime/FSTimes/Volume2/Issue1/qanda.html.</p><p>Bureau of Land Management 2012. "The BLM's Priorities for Recreation and Visitor Services." http://www.blm.gov/pgdata/etc/medialib/blm/id/publications/Par.99986.File.dat/revisit.pdf&ei=PQNqUKrYG5SC9QTVloGgDg&usq=AFQJCNEj1fY4K6AmYyPLZ70KOhayDX78g&sig2=35QF8Jx8VZG7A3K8ajWxQQ.</p><p>California Department of Boating and Waterways and State Coastal Conservancy 2002. California Beach Restoration Study, January 2002, Sacramento, CA. http://www.dbw.ca.gov/PDF/Reports/BeachReport/FULL.pdf.</p><p>Clean Beaches Council 2012. "Clean Beaches Vital to US Economic Recovery." http://www.cleanbeaches.com/.</p><p><i>Computerworld</i> 2010. "IBM stops disclosing U.S. headcount data." http://www.computerworld.com/s/article/9169678/IBM_stops_disclosing_U_S_headcount_data.</p><p>Environmental Working Group 2012. "Farm Subsidies, The United States Summary Information." http://farm.ewg.org/region.php?flps=00000&progecode=total&yr=2011.</p><p>Expedia.com 2012. "Expedia Releases 2012 Flip Flop Report: Study Examines Beachgoer Behavior and Preferences Across Five Continents." http://mediaroom.expedia.com/travel-news/expedia-flip-flop-report-1671.</p><p>Greater Miami and the Beaches 2012. Greater Miami and the Beaches, 2010 Visitor Industry Overview: Visitor Profile, Economic Impact, Hotel Performance, Jobs. http://www.miamiandbeaches.com/Pictures/WebRpt/Annual%20Report%202010.pdf.</p><p>Hall, C., and M. Staimer 1995. "Concerns about the coast." <i>USA Today</i>, Page 1A, 9 August 1995.</p><p>Hawaii Tourism Authority 2012. "Waikiki Beach Maintenance Project." http://hawaii.gov/dlnr/occl/manuals-reports/110211%20Waikiki%20Beach%20Flier.pdf/at_download/file.</p><p>Hotel-online 1998. "Increased Pressure on National Promotional Budgets." http://www.hotel-online.com/News/PressReleases1998_4th/Nov98_PATA.html.</p><p>Houston, J.R., 1995a. "The Economic Value of Beaches." <i>The CERCUlar, Coastal Engineering Research Center, Waterways Experiment Station, Vol. CERC-95-4</i>, Dec 1995, 1-4.</p><p>Houston, James. R., 1995b. "Beach Nourishment, Coastal Forum." <i>Shore & Beach</i>, 63(1), 21-24.</p><p>Houston, J.R., 1996. "International Tourism & U.S. Beaches." <i>Shore & Beach</i>, 64(2), 3-4.</p><p>Houston, J.R., 2002. "The Economic Value of Beaches — 2002 Update." <i>Shore & Beach</i>, 70(1), 9-12.</p><p>Houston, J.R., 2008. "The Economic Value of Beaches — a 2008 Update." <i>Shore & Beach</i>, 76(3), 22-26.</p><p>Kelletat, D., 1992. "Coastal Erosion and Protection Measures at the German North Sea Coast." <i>J. Coastal Res.</i>, 8(3), 699-711.</p><p>King, P., 1999. "The Fiscal Impact of Beaches in California." Public Research Institute, University of San Francisco, http://online.sfsu.edu/~pgking/handouts/thefiscalimpactofbeaches.pdf.</p><p>King, P., and D. Symes 2003. "The Potential Loss in Gross National Product and Gross State Product from a Failure to Maintain California's Beaches." San Francisco State University, http://userwww.sfsu.edu/pgking/Econ%20Impact%20of%20Out%20of%20State%20and%20For%20tourism%20v7.pdf.</p><p>Klein, Y.L., and J. Osleeb 2010. "Determinants of Coastal Tourism: A Case Study of Florida Beach Counties." <i>J. Coastal Res.</i>, 26(6), 1149-1156. http://www.jronline.org/doi/pdf/10.2112%2FJCOASTRES-D-09-00152.1.</p><p>Klein, Y.L., J. Osleeb, and M. Viola 2004. "Tourism-generated earnings in the coastal zone: A regional analysis." <i>J. Coastal Res.</i>, 20(4), 1080-1088, West Palm Beach (Florida) ISSN 0749-0208.</p><p>Marine Facilities Panel 1991. "U.S. Japan Wind and Seismic Effects Panel." 17th Joint Meeting, J-4), 1-9, Tokyo, Japan.</p></div></div> <div data-bbox="749 1675 811 1695" data-label="Page-Footer"><p>Page 10</p></div> <div data-bbox="1296 1675 1665 1695" data-label="Page-Footer"><p>Shore & Beach ■ Vol. 81, No. 1 ■ Winter 2013</p></div>	

Number	Commenter	Comment	Corps Response
		<p>Marlowe, Howard. 1999. "Assessing the Economic Benefits of America's Coastal Regions." http://www.coastalcoalition.org/facts/coastalregions.html.</p> <p>Match.com 2012. "Match.com Names Miami Best Summer Vacation Destination for Singles." http://match.mediaroom.com/index.php?s=43&item=97</p> <p>Ministerio de Obras Publicas y Transportes 1993. "Recuperando La Costa." Serie Monografias, Centro de Publicaciones, Madrid, Spain.</p> <p>Murley, J.F., L. Alpert, W.B. Stronge, and R. Dow 2005. "Tourism in paradise: The Economic Impact of Florida Beaches." Proceedings of the 14th Biennial Coastal Zone Conference, New Orleans, Louisiana. http://www.csc.noaa.gov/cz/CZ05_Proceedings.pdf files/Alpert.pdf</p> <p>National Association of State Park Directors 2012. "America's State Parks Alliance Launched to Advocate for Healthful and Economic Benefits Provided by the 50 States." http://www.naspd.org.</p> <p>National Parks Conservation Association 2012. "Made in America, Investing in National Parks for Our Heritage and Our Economy." http://www.npsa.org/assets/pdf/Made_In_America_Report.pdf.</p> <p>National Oceanic and Atmospheric Administration 1998. "Promotion of International Tourism to the United States." http://www.yoto98.noaa.gov/yoto/meeting/tour_rec_316.html.</p> <p>National Park Service 2012a. "Ten Most Visited Parks, Park Visitation Figures." http://www.npsa.org/exploring-our-parks/visitation.html?gclid=COzeftj4LICFQcGnQodTXeAPg.</p> <p>National Park Service 2012b. "NPS Stats, National Park Service Visitor Use Statistics." https://irma.nps.gov/Stats/.</p> <p>National Park Service 2012c. Budget. http://www.nps.gov/aboutus/budget.htm.</p> <p>National Science Foundation 2012. "Deficit in Goods Trade, Surplus in Services and Intangibles, Science and Engineering Indicators 2012, Overview." http://www.nsf.gov/statistics/seind12/pdf/overview.pdf.</p> <p>National Tour Association 2007. "The Case for a Cabinet-Level Tourism Department in the United States Federal Government." http://www.ntaonline.com/doc_lib/caseforcabinetleveltourism.pdf.</p> <p>National Tour Association 2012. "NTA Questions House Vote to Defund Brand USA." http://www.ntaonline.com/articles/index.cfm?acton=view&articleID=2447&menuID=0.</p> <p><i>New York Times</i> 2007. "The Search for Sand is No Day at the Beach." 16 September 2007. http://travel.nytimes.com/2007/09/16/travel/16heads.html.</p> <p><i>New York Times</i> 2012a. "Unboxed Extra: IBM and America's Job Challenge." http://bits.blogs.nytimes.com/2012/01/01/unboxed-extra-ibm-and-americas-job-challenge/.</p> <p><i>New York Times</i> 2012b. "Travel Hiring Is on the Rise." http://www.nytimes.com/2012/01/24/business/for-travel-and-tourism-hiring-is-on-the-rise-cautiously.html?_r=0.</p> <p>NJ.com 2012. "Dune size determined extent of storm damage on NJ beaches." Available online at http://www.nj.com/news/index.ssf/2012/11/dune_size_determined_extent_of.html.</p> <p>Riggins, J., 2012. "Despite economy, Spanish tourism prospers." Smartplanet http://www.smartplanet.com/blog/global-observer/despite-economy-spanish-tourism-prospers/3579.</p> <p>Robinson, D., 2002. "What are the National and Regional Economic Benefits of Shore Protection Projects?" Proceedings of a Workshop for the National Shoreline Management Study, 23-24 July 2002, The George Washington University, Washington DC.</p> <p>State of Hawaii, Department of Business, Economic Development, and Tourism 2012. "Annual Visitor Research Report." http://hawaii.gov/dbedt/info/visitor-stats/visitor-research/2011-annual-visitor.xls.</p> <p>Themed Entertainment Association 2012. 2010 "Theme Index." http://www.themeit.com/etea/2010Report.pdf.</p> <p><i>Time</i> magazine 1977. "Business: Ebb tide at Miami Beach." Available online at http://www.time.com/time/magazine/article/0,9171,945864,00.html.</p> <p>Tourism Queensland 2012. "Tourism Facts and Figures - Year ended June 2012." http://www.tq.com.au/fms/tq_corporate/research%20%28NEW%29/Summary%20Visitor%20Statistics/12%20June%20Tourism%20Facts%20and%20Figures.pdf.</p> <p>TradeReform 2012. "U.S. high-tech jobs lost as technological lead shrinks." http://www.tradereform.org/2012/01/u-s-high-tech-jobs-lost-as-technological-lead-shrinks/.</p> <p><i>Travel and Leisure</i> 2012. "America's most crowded beaches." http://www.travelandleisure.com/articles/americas-most-crowded-beaches.</p> <p>TripAdvisor 2011. "TripAdvisor Announces 2012 Travel Trends Forecast." http://www.tripadvisor.com/PressCenter-i4894-c1-Press_Releases.html.</p> <p>United Nations 2010. "GDP/Breakdown at Current Prices in US Dollars (All Countries)." http://unstats.un.org/unsd/snaama/dnltransfer.asp?ID=2.</p> <p>U.S. Army Corps of Engineers 1994. "Shoreline Protection and Beach Erosion Control Study, Phase I. Cost Comparison of Shoreline Protection Projects of the U.S. Army Corps of Engineers." Water Resources Support Center, Washington, DC, USA.</p> <p>U.S. Army Corps of Engineers 2001. "Sandy Hook to Barnegat Inlet, New Jersey, Beach Erosion Control Project." http://www.nan.usace.army.mil/LinkClick.aspx?fileticket=9uKL5a8OAlM%3d&tabid=4611&mid=12742.</p> <p>U.S. Bureau of Labor Statistics 2012a. "Manufacturing: NAICS 31-33, Workforce statistics." http://www.bls.gov/iag/tgs/iag31-33.htm#workforce.</p> <p>U.S. Bureau of Labor Statistics 2012b. "Table A-1. Employment status of the civilian population by sex and age." http://www.bls.gov/news.release/empsit.t01.htm.</p> <p>U.S. Bureau of Labor Statistics 2012c. "Databases, Tables & Calculators by Subject, Manufacturing." http://data.bls.gov/timeseries/CES3000000001.</p> <p>U.S. Bureau of Labor Statistics 2012d. "Databases, Tables & Calculators by Subject, CPI Inflation Calculator." http://www.bls.gov/data/inflation_calculator.htm.</p> <p>U.S. Census Bureau 2011. "Population Distribution and Change: 2000 to 2010." http://www.census.gov/prod/cen2010/briefs/c2010br-01.pdf.</p> <p>U.S. Census Bureau 2012. "U.S. International Trade in Goods and Services, Annual Revision for 2011." http://www.census.gov/foreign-trade/Press-Release/2011pr/fnal_revisions/full.</p> <p>U.S. Department of Commerce 2011. "United States Travel and Tourism Exports, Imports, and the Balance of Trade 2011." http://www.tinet.ita.doc.gov/outreachpages/download_data_table/2011_International_Visitor_Spending.pdf.</p> <p>U.S. Department of the Interior 2012. "The Department of the Interior's Economic Contributions, Fiscal Year 2011." http://www.doi.gov/ppa/upload/2011-Econ-Report-FINAL-07_27_2012.pdf.</p> <p>U.S. Travel Association 2009. "The Impact of Travel on State Economies, 2009 Research Report." http://commerce.idaho.gov/assets/content/docs/Research/Impact%20of%20Travel%20on%20State%20Economies%2009.pdf.</p> <p>U.S. Travel Association 2012. "Talking Points and Facts." http://www.ustravel.org/marketing/national-travel-and-tourism-week/talking-points-and-facts.</p> <p>U.S. Travel and Tourism Administration 1993. "World Tourism at the Millennium." U.S. Department of Commerce, April 1993, 97 p.</p> <p><i>Wall Street Journal</i> 1994. "The Other American Dream Team." 15 February 1994.</p> <p><i>Washington Post</i> 2012. "U.S. losing high-tech manufacturing jobs to Asia." http://www.washingtonpost.com/business/economy/us-losing-high-tech-manufacturing-jobs-to-asia/2012/01/17/gIQA9P1S6P_story.html.</p> <p><i>Washington Post</i> 1995. "Chet's Bemoan a Reduction in Their Favorite Deduction." Page D4, 11 April 1995.</p> <p>Wiegel, R.L., 1992. "Dade County, Florida, Beach Nourishment and Hurricane Surge Study." <i>Shore & Beach</i>, 60 (4), 2-26.</p> <p>World Almanac 2012. Funk & Wagnalls Corp., Mahwah, NJ.</p> <p>World Travel and Tourism Council 2007. "The 2007 Travel and Tourism Economic Research." http://www.wttec.travel/bin/pdf/original_pdf_file/world.pdf.</p> <p>World Travel and Tourism Council 2011a. "Travel & Tourism, Economic Impact 2012, World." http://www.wttec.org/site_media/uploads/downloads/world2012.pdf.</p> <p>World Travel and Tourism Council 2011b. "Travel & Tourism, Economic Impact 2012, United States." http://www.wttec.org/site_media/uploads/downloads/united_states2012.pdf.</p> <p>World Travel and Tourism Council 2012. "League Table Summary, 2012." http://www.wttec.org/site_media/uploads/downloads/NewLeagueTableSummaryBase2011.pdf.</p> <p>Yepes, V., and J.R. Medina 2005. "Land Use Tourism Models in Spanish Coastal Areas: A Case Study of the Valencia Region." <i>J. Coastal Res.</i>, S149, 83-88, ISSN 0749-0208.</p> <p>Zukin, Cliff, 1998. "New Jerseyans, Summer and Shore Features: A Long Term Look, The Shore - Looking up (Save the Beach Passes)." <i>The Star-Ledger/Eagleton-Ruigers Poll</i>, http://www.rci.ruigers.edu/~eaglepoll/Ledger.dir/Release119.dir/release3.htm.</p>	



Number	Commenter	Comment	Corps Response
105	Enid Seneriz Jan 5, 2021	<p>I concur with the comments and request of the Licensed Representative Mariana Nogales Molinelli and Dr. Miguels Canals.</p> <p>Enid Señeriz Ortiz, Entrepreneur and former Candidate for the Alcaldía de Rincón by the Victoria Citizen Movement</p> <p>PDF with News release in Spanish: “MNM - Comunicado de prensa 01 05 21”</p> <p>Comunicado de prensa Para publicación inmediata</p> <p>Representante Nogales Molinelli solicita extensión de periodo de comentarios a informe sobre costas del Cuerpo de Ingenieros</p> <p>(5 de enero de 2021 - San Juan, PR) La representante por acumulación Mariana Nogales Molinelli solicitó hoy al Cuerpo de Ingenieros de Estados Unidos (USACE, por sus siglas en inglés) que extienda por 30 días adicionales el periodo de comentarios al borrador del Informe Integrado de Viabilidad y Evaluación Ambiental sobre las costas de Puerto Rico, término que, de no ser ampliado, expirará mañana sin que sectores con interés en el tema hayan tenido la oportunidad de participar.</p> <p>Mediante carta cursada a la jefa de la rama ambiental del USACE, Nogales Molinelli resaltó que no fue hasta el pasado 28 de diciembre que un reportaje del Centro de Periodismo Investigativo dio a conocer ampliamente que el documento de 231 páginas, publicado solo en inglés y con lenguaje altamente técnico, estaba disponible para la evaluación del público. La abogada indicó que, aunque el término para presentar comentarios comenzó el 20 de noviembre y, según la página web del USACE, se llevó a cabo un seminario en línea el 10 de diciembre, la promoción parece haber sido insuficiente pues no llegó a muchos sectores con interés, incluyéndole.</p> <p>"Estamos en medio de una pandemia que ha afectado nuestras vidas y ha limitado el acceso a información debido a la disminución de actividades grupales en las que las personas usualmente comparten información y preocupaciones," destacó la legisladora al señalar que tanto residentes de comunidades costeras como miembros reconocidos de la comunidad científica han levantado preocupaciones sobre el impacto de los proyectos propuestos y la falta de tiempo suficiente para analizarlos y comentarlos.</p> <p>Nogales Mollineli advirtió que los planes del USACE, entre ellos uno que eliminaría parte de las playas de Rincón y en San Juan para proteger estructuras construidas frente al mar, tienen el potencial de impactar profundamente la vida y el ambiente en las comunidades aledañas. "Para una verdadera evaluación de impacto, el Cuerpo de Ingenieros debe hacer el espacio para escuchar a la gente que se va a ver afectada por estos proyectos así como a las comunidades costeras a merced del cambio climático que fueron excluidas de estos planes por no cumplir con ciertos criterios económicos. Para eso necesitamos más tiempo y que se provea la información de modo accesible al público general," opinó la legisladora.</p> <p>###</p>	<p>PRIMARY CONCERN: TSP in Rincon- Requesting review time extension</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.</p> <p>A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features.</p> <p>We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.</p>

Number	Commenter	Comment	Corps Response
106	Sandra Otero Jan 5, 2021	<p>Please see attached documents. Confirm receiving this email. PDF with formal comments: “Plaza del Mar - carta cuerpo de ingenieros-merged”</p> <div></div> <p>5 de enero de 2021</p> <p>Cuerpo de Ingenieros Estados Unidos USACE</p> <p>A quien pueda interesar:</p> <p>La costa oeste de Isla Verde ha sido gravemente afectada por el calentamiento global. Áreas que en el pasado tenían arena han perdido la misma al punto de que los muros de varios condominios han sido socavados y han requerido refuerzo. La orilla de arena se ha reducido y, en muchos de los días, el oleaje rompe con los muros de las edificaciones y no hay orilla que permita comunicar un lado de la playa al otro. Existe un rompeolas que desde hace 30 años protege esta área de costa pero el fuerte oleaje y el embate del tiempo ha causado que el mismo se deteriore por lo cual el mar impacta la orilla con mayor severidad.</p> <p>Solicitamos añadan la costa que queda frente a nuestros condominios (conocida como las pocitas de Isla Verde) al estudio costero de Puerto Rico con el cual actualmente trabaja el Cuerpo de Ingenieros. Soy residente del Condominio Plaza del Mar que ubica en el 3001 de la Avenida Isla Verde en Carolina PR. Nuestra comunidad consta de 130 unidades de vivienda con un promedio de ocupación de 3 personas por apartamento. Los condominios Condesa del Mar y Galaxy, adyacentes al nuestro, también se afectan directamente con esta situación. Contiguo a nosotros ubica el acceso a la playa por lo cual el área es frecuentada por sin número de personas, especialmente de la comunidad de Llorens Torres. Proteger y restaurar esta zona costera beneficiará a miles de personas.</p> <p>La reparación del rompeolas traería grandes beneficios a corto y a largo plazo. A corto plazo el disfrute inmediato de una playa hermosa y segura que es patrimonio de todos los puertorriqueños. A largo plazo obtendremos la conservación de la flora y fauna y la protección de las edificaciones existentes.</p> <p>Estamos en la mejor disposición en ayudar a que este proyecto se lleve a cabo y se conserven y reparen nuestras playas para el disfrute de todos. Gracias por todos los esfuerzos realizados hasta ahora.</p> <p>Cualquier duda y/o pregunta pueden contactar a Jennifer Rodríguez al (787)382-6787 ó plazadelmarpr@gmail.com.</p> <p>Cordialmente,</p> <div></div> <p>Jennifer Rodríguez Secretaria Junta de Directores Condominio Plaza del Mar</p> <p><i>Oficina de Administración / 3001 Ave Isla Verde, Carolina, PR 00979 (787)201-9623 / plazadelmarpr@gmail.com</i></p>	<p>PRIMARY CONCERN: Isla Verde</p> <p>Thank you for your comment. Early modeling of Isla Verde planning reach indicated minimal erosion, with natural beach recovery after storms and seasonal shift, resulting in very low damages to structures. After careful consideration and support by the non-Federal sponsor, due to this low risk, this planning reach was not carried forward for further analysis. Moreover, a portion of the actual Isla Verde community was included in the Ocean Park planning reach (R15 to R11) due to the nature of coastal flooding that overlaps in these communities. Therefore, coastal flooding problems in Isla Verde are reduced with the proposed tentatively selected plan within the Ocean Park planning reach. Notably, Condominio Plaz del Maris included in the vicinity of the tentatively selected plan, where a seawall is proposed just to the west of Condominio Plaz del Mar. The seawall would serve the primary function of reducing coastal flooding damages within the San Juan Metro area and would also provide stability to the shoreline. Behind the seawall, sand would be placed. This area would be owned by the San Juan Municipality and could be potentially used for public recreation.</p>

Number	Commenter	Comment	Corps Response
		<div data-bbox="727 387 1184 989"></div> <div data-bbox="1236 387 1690 989"></div> <div data-bbox="727 1026 1184 1630"></div> <div data-bbox="1236 1026 1690 1630"></div>	


Number	Commenter	Comment	Corps Response
		<div data-bbox="752 383 1668 967"><p>POTENTIAL ECONOMIC DAMAGES IN FUTURE WITHOUT-PROJECT</p><p>Callouts include:</p><ul style="list-style-type: none">RINCÓN: PWOP (PV) \$1.4M Screened outCONDADO WEST HEADLAND: PWOP (PV) \$5M Screened outPUNTA PEDRITA HEADLAND: PWOP (PV) \$48.3M Moving ForwardPUNTA LAS MARAS HEADLAND: PWOP (PV) \$16.2M West side Moving ForwardPUNTA EL MEDIO HEADLAND (WEST): PWOP (PV) \$0.8M Screened outCONDADO POCKET BEACH: PWOP (PV) \$15.9M Moving ForwardOCEAN PARK POCKET BEACH: PWOP (PV) \$131.6M Moving ForwardGLAVIERA POCKET BEACH: PWOP (PV) \$4.1M Screened outRINCÓN POCKET BEACH: PWOP (PV) \$13.6M Moving Forward<p>Note: Future Without Project (FWOP) damages are estimated over 50 years, and presented in Present Value (PV)</p></div> <div data-bbox="761 1016 1224 1620"><p>Plaza Del Mar Condominium</p><p>Condesa Del Mar</p></div> <div data-bbox="1264 1016 1675 1620"></div>	

Number	Commenter	Comment	Corps Response
107	Robert Duerr Jan 5, 2021	<p>I am Bob Duerr, a lifetime member of Surfrider Foundation, past chapter chairman, President of LOYF, Inc, and resident of Barrio Puntas, in Rincon, PR</p> <p>Please add my letter to those who are against any ACOE manipulation or armoring of the beaches in Rincon, Puerto Rico.</p> <p>The building codes that have allowed encroachment to the waters edge has got to be addressed in the same manner as North Carolina. Once a residence is uninhabitable, demolish it and nothing may be built there.</p> <p>The idea that any design will hold back rising seas is not credible and a waste of taxpayer money which could be used in so many other public projects, rebuilding roads, and energy grids.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
108	Maria Cruz Jan 5, 2021	<p>I am writing to express my concern, as a U. S. Citizen and a resident of the town of Rincon, Puerto Rico, about the plans to alter the composition of some of the town’s beaches in order to control erosion. I am not a scientist, just a concerned citizen. Nevertheless, based on what little material I was able to read, I agree with and support Rincón Surfriders Foundation’s recommendations.</p> <p>Rincon depends heavily and is identified mostly with its waves and the surfing that comes with it. But as an Airbnb owner I have come to learn that the lifestyle brings people of all walks of life and from all parts of the world. Rincon is a worldwide destination. I have seen it firsthand in my business. We own property in the hills and have had guests from places as varied as Spain; Vienna, Austria and Frankfurt, Germany and many States of the Union. And most of them are not surfers, but it’s the lifestyle, and the ambience that this brings, plus the beaches, that keeps them coming.</p> <p>We appreciate the fact that something is being done about the problem and understand the challenges that your organization has faced. We lived in Tampa, Florida on and off for 29 years and I have read about the Kissimmee River/ Everglades situation and I am really concerned that whatever is finally done here in Rincón is not something that you have to come back to, 5 to 10 years from now, to undo. Everyone makes mistakes but this is something we would have to live with for a long time and one we may not be able to come back from. Please take your time and listen to what some of our scientists have to say.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
109	Surfrider Rincon Jan 5, 2021	<p>Please find attached our comment letter outlining our opposition to the USACE Provisional Proposal for Rincón as has been presented to date, and our further suggestions and encouragement for collaboratively developing a modified proposal which we feel would be equally as effective while posing less damage to our local coastal resources and our community's economic assets.</p> <p>Thank you for your consideration, and we look forward to further discussions of this potential modification of the project design.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>

Number	Commenter	Comment	Corps Response
		<div><div><p>SURFRIDER FOUNDATION RINCÓN CHAPTER Facebook: Fundacion Sufrider Rincón</p></div><div><p>SURFRIDER FOUNDATION RINCÓN</p><p>19 Calle Nueva Rincón, PR</p><p>Mailing: P.O. Box 902 Rincón, PR 00677</p><p>https://rincon.surfrider.org/</p></div><div><p>SURFRIDER FOUNDATION</p><p>BLUE WATER TASK FORCE</p><p>RINCÓN</p><p>https://bwtf.surfrider.org/explore/4</p></div></div> <p>Jan 4, 2021</p> <p>Re: Puerto Rico Coastal Study, Rincón area</p> <p>Greetings!</p> <p>On behalf of the Rincón chapter of the Surfrider Foundation, I must express our rejection of the Provisional Plan as presented in the recent virtual USACE workshops and outlined in the CSRM Feasibility Study, and highly encourage the USACE to seriously consider modifying and adapting this plan to a design that poses the least risk to our coastline and community, while providing the most effective benefit towards the Corps' stated objectives.</p> <p>Our principal objections to the provisional plan are based on two issues: the risk of increased coastal erosion to beaches outside the proposal boundaries, and; that rock revetments provide no natural sand retention capacity for beach recovery. We have also had comments concerning a potential risk of inadvertent privatization / reduced public access to the several remaining pocket beaches caused by the exclusive use of rock revetment design. These risks and concerns are directly contrary to our mission statement of protecting coastal waters and beaches, and the public enjoyment of them.</p> <p>The purpose of any coastal hardening is to divert erosive wave effects of course, and more than a mile of revetment would inevitably divert a significant portion of that erosive energy to beaches that remain immediately on either end of the project boundaries, putting additional properties and recreational assests at increased risk. For that reason alone the proposed design in unacceptable.</p> <p>Further, rock revetment provides little or no sand retention capacity during seasonal natural longshore sand movement. This can clearly been seen in the several areas where similar loose rock revetments were privately constructed after Hurricane Maria, where those areas are showing no retention / beach recovery at all since that time.</p> <p>In view of the above points however, the chapter is actively advocating the use of these type of revetments in an area that we feel requires them, which would be the eroding old municipal dump site located immediately south of Playa Lala and the AAA sewage pumping substation, to the north of the present plan. Currently this site is within the wave swash zone of the marine terrestrial boundary, and is directly releasing broken glass, compressed and/or burned garbage, and possibly other unknown contaminants into the waters immediately adjacent to a popular recreational beach, and approximately 120m from the municipal balneario. Obviously such debris poses a significant threat to public health and safety for recreational areas whose use currently contributes towards the local economy and employment, as outlined in the Corps proposal requirements. We highly encourage the Corps to include this area in the modified proposal, noting that rock revetments seem the only alternative to physically</p>	

Number	Commenter	Comment	Corps Response
		<p>removing the accumulated garbage to another secure inland site.</p> <p>In view of the actual and ongoing threat to public health and safety actively posed by the eroding dump, the chapter recognizes that a similar situation exists in a few isolated instances within the proposed project area, where two or three adjacent inhabited multi-unit edifices are also within the swash zone and at imminent risk of being undercut by wave action, causing structural failure. Again, without physically relocating these structures to less vulnerable areas, the only available option seems to be rock revetments. We note that this has already been accomplished after Hurricane Maria by the individual owners, and that the USACE proposal would provide only minimal additional robustness, by the deployment of marine mattresses in the design, compared to what exists now. These areas would compose a minor percentage of the entire coastline under consideration in this proposal.</p> <p>We agree that the option of 'beach nourishment' via the addition of sand from upland sources does not seem to be a viable approach, given the historical extremely dynamic nature of the coastline in this area, and the huge amounts of sand movement that typically occurs seasonally. Any additional beach enrichment would provide, at best, a very temporary benefit and likely not be cost effective under USACE guidelines.</p> <p>It is an unfortunate fact that most of the remaining sandy pocket beaches do not have the sufficient area to deploy our most favored techniques of green infrastructure and vegetated berms at this time, under the 'Living Shorelines' provisions, . Thus the only way to protect these sandy areas from further storm surge erosion and other erosive marine effects, while maintaining their potential capacity to retain and accumulate sand from the longshore current movement, is to dissipate the erosive energy of the waves before they reach shore. This is why the chapter also strongly promotes modifying the plan significantly to include the use of a series if small offshore breakwaters to protect those pocket beaches that remain in the project area, as outlined in the alternative design being developed by CariCOOS, Sea Grant and others. This design poses the least risk of interfering with natural longshore sand movement patterns, preserves current public access routes, use, and recreational value, while reducing erosive wave effects on coastal property and economic assets both within, and immediately adjacent to, the project area..</p> <p>We are certainly available to provide further information to, or join discussions with, the USACE regarding this proposal.</p> <p>Respectfully,</p> <p>Steve Tamar Vice chair, Surfrider Foundation Rincón</p>	

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
110	Heriberto Leon Jan 5, 2021	Will there be an extension to the comment period on on the draft Integrated Feasibility Report and Environmental Assessment report? I understand that submissions are currently due on 1/6/2021. When did the comment period begin? Are the draft and appendices available in Spanish?	PRIMARY CONCERN: Requesting review time extension Thank you for your comment The draft Integrated Feasibility Report and Environmental Assessment was released for Public Review on November 20, 2020. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. The report documents have been prepared in English, however supporting summaries are in both English and Spanish.
111	Ana Castaner Jan 5, 2021	<p>I respectfully would like you to include in your erosion evaluation of the PR coasts, the Dorado Beach area in particular, and the terrible erosion happening in the last years on the BREÑAS beach just west of the Dorado Beach resort and at the entrance to the Mata Redonda lagoon. The coast and sand in that area is quickly eroding and disappearing due to the erosion caused by the many rocks and boulders that are being constantly placed on top of the beach on this sensitive point, obstructing the waves from depositing the sand in the beach. The area in front of the Mata Redonda lagoon all the way to the northern tip and in front of the housing development “Cottages at Dorado Beach” is slowly falling into the ocean.</p> <p>This whole area had the most beautiful beach many years ago without any rocks. The beach has changed dramatically since Dorado Beach started putting rocks and boulders on top of the sand and coast, followed by the cages with boulders and rocks put in by the Cottages.</p> <p>Please see pictures attached below of the rocks that have been placed on top of what once a beautiful sandy beach(1&2 pictures), a construction of a 6-8 story building on that delicate area right at the same eroded spot (3&4 pictures), placement of rocks and boulders on top of sand (5& 6), construction debris and fences falling and hollowed by the waves , filled in by boulders etc (7&8)</p> <p>Please the Corps of Engineers should take a look at how this area can be salvaged before it is further damage and swallowed by the waves</p> 	PRIMARY CONCERN: Requesting to include Dorado Beach (outside of the study area) Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.

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Number	Commenter	Comment	Corps Response
112	Adam Mayfield Jan 5, 2021	Although I appreciate your commitment and dedication to finding a solution for preventing erosion, placing boulders on Stella Beach in Rincon is not the answer. This decision will undoubtedly cause irreparable and unprecedented damage to not only the ecology of the landscape, but to residents' property value as well as the local economy, not to mention forever tarnishing a historically famous and beautiful stretch of Rincon's shoreline. I vehemently oppose this decision. Please reconsider!	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
113	Ann Claxton Jan 5, 2021	This is an earnest, heartfelt and evidence -based plea to cease and desist with plans to place boulders as erosion control on Rincon Beach in Puerto Rico. The residents and visitors are against such an ugly defacement of property and the environment. There are other solutions and the voice of residents should be heeded.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
114	Byron Callas Jan 5, 2021	I vote NO to boulders on the beach along Stella Beach as a solution to erosion. It is a horrid solution that will destroy the beach, destroy all the reasons I desire to go to that beautiful beach. It is a short-sighted solution that does not support the interest of all of us who have loved that beach for decades, generations even. I hope action will be taken to stop this assault in serious consideration for all of us who are horrified at this proposed solution.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
115	Beth Banning Jan 5, 2021	I am writing to express my opposition to placing boulders along Stella Beach to reduce erosion. I have been a tourist there for many years and would be very disappointed. I also understand the residents of Rincon are against this and I trust their judgement on this matter. I ask you not to go through with this!	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

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Number	Commenter	Comment	Corps Response
116	Fred Hodder Jan 5, 2021	For many years I have regularly gone to Rincon to enjoy the ocean and the beach. I very much object to the proposal to place boulders along Stella Beach as a means of mitigating erosion. I implore you to stop this plan and consider other alternatives. It is a grave, irreversible mistake to destroy this important resource	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
117	Jack Davis Jan 5, 2021	I do not support the use of boulders as the solution to erosion on the beaches. There needs to be a way that can retard erosion while maintaining a beachfront.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
118	Arnaldo Ruiz Jan 6, 2021	On behalf of the largest hotel property on the coast of Rincon, we strongly oppose the proposed project. Eliminating one mile of beach will have a negative impact on the local economy. In our case, we employ over 150 persons in a low income community. We urge the USACE to consider modifying your design and incorporate breakwaters (like in Ocean Park) that could preserve parts of the existing beach. President HR Inc (Rincón of the Seas Grand Caribbean Hotel)	PRIMARY CONCERN: TSP in Rincon – Rincon of the Seas Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
119	Manuel Canino Jan 6, 2021	I believe public hearings should be held in order to weigh the pros and cons of project , once this project starts there is no going back , we own it to future generations, our beaches is one of our beautiful resources , do we really want more cement and rocks adorning our landscape , . 30 days can make a difference for decades to come	PRIMARY CONCERN: TSP in Rincon - Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

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120	Ivet Teros Jan 6, 2021	By this, I am making a request for 30 additional days in order to know, analyze and see details and options of the study	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
121	Carmen Nunez Jan 6, 2021	Allow more time to discuss this proposal	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
122	Joel Fernandez Jan 6, 2021	I Joel Fernandez Bonilla as a citizen of the island of Puerto Rico for 50 years I ask you to grant us an additional period of 30 days for evaluation and to know the details of the projects that seek to protect the properties and infrastructure of San Juan and Rincón from swell, flooding and erosion	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
123	Jorge Lugo Jan 6, 2021	I Jorge D Lugo American citizen residing in Puerto Rico request a 30 days window extension in order to read and inform myself with the Puerto Rico Coastal Study survey, and by extension to provide an opinion about that geographical area.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
124	Joel Muniz Jan 6, 2021	Asking extension of 30 days.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
125	Francheska Soto Jan 6, 2021	I request 30 more days to review the draft.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
126	Debbie Rivera Jan 6, 2021	I hereby join others in a request for an additional thirty-day term to bring the much-needed coastal study to conclusion	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
127	Jose Miguel Valle Jan 6, 2021	My name is Jose M Valle Caro. Resident of Rincon all my life for the past 35 years. By this means I want to join the request to extend the Comments period for an additional 30 days to complete the review of the Environment Evaluation and Integrated Viability Report of the coast lines of Puerto Rico.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
128	Eric Sparre Jan 6, 2021	I would like to register my strong opposition to the proposal to layer the beach with boulders in order to “protect property”. I have spent a fair amount of time there and I know there are other solutions besides the one that will in fact destroy the beach and make the sea difficult to reach. Please reconsider this decision.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

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129	Jorge Carreras Jan 6, 2021	the document regarding the actions to be taken are in English and not available to Spanish speaking residents of PR which are 99% of the total population. Because of this we respectfully request a 30-day extension so the information can be translated and presented	PRIMARY CONCERN: Requesting review time extension Thank you for your comment The draft Integrated Feasibility Report and Environmental Assessment was released for Public Review on November 20, 2020. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. The report documents have been prepared in English, however supporting summaries are in both English and Spanish.
130	Norma Valle Jan 6, 2021	I do not like the idea of rocks in front of the beach. It should be as natural as possible. Not more beach houses construction once the nature takes its course.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
131	Khalid Draper Jan 6, 2021	<p>The purpose of this brief missive is to communicate my disapproval of, and disagreement with the plan to use large rocks and boulders along the coast of Rincon, Puerto Rico as a solution to coastal erosion. Surely there must be another option that will not drastically change the aesthetics of Puerto Rico's western coast. These beaches are treasured by the local community, and additionally, the current plan would adversely affect the businesses which rely on the tourism generated by them.</p> <p>The majority of the populace of Rincón, those whose familial roots are based here, as well as others who have come to consider it their home, stand united in the desire for a solution that minimizes the effect on daily life and business in the area.</p>	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
132	Alana Mendez Jan 6, 2021	As a Rincón resident I wish to express my opposition to the provisional proposal of the revetment seawall. This project will ruin our beaches in the future and attempt to destroy our economy in Rincón, which is primarily based on Tourism that revolve around the beaches. Please consider other options where our public beaches won't be affected.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
133	Hector Ruiz Jan 6, 2021	I concur with the request of additional time so we can get taught and know all the details	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
134	Maggie Irizarry Jan 6, 2021	I just learned about this report and the fact that the comment period ends today. Please extend the comment period for another 30 days so that the people of Puerto Rico can provide comments on the report.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.

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135	Pedro Colberg Jan 6, 2021	We are witness of the severe coastal erosion that is taking place in the Corcega Area in Rincon, Puerto Rico. We have no sand, no beach in front of our apartment building and we already lost our pools and gazebo with Hurricane Maria. The waves keep pounding over our complex fence and if nothing is done, we will lose our properties. There are no insurance companies at the moment that will insure our properties. Please keep your good plan and protect our coast and homes. There is no beach nor sand already.	PRIMARY CONCERN: Support of TSP in Rincon – Corcega Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
136	Magaly Castillo Jan 6, 2021	I request 30 more days to review the draft and provide comments.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
137	Gredia Huerta Jan 6, 2021	<p>We represent the Puerto Rico Clinicians for Climate Action (PR-CCA). The PR-CCA is a group of physicians, from different medical specialties, whose principal mission is to educate clinicians and the communities about climate change and to advocate for climate solutions. We believe that climate solutions are human health solutions. And to be effective, these solutions require collaborative work involving key partners in the representation of all the different areas of our society.</p> <p>Climate change is an undeniable problem and represents a global public health emergency. The science supporting the association between climate change and adverse health outcomes, especially among the most vulnerable groups, is robust. From the increase in the frequency of extreme weather events to the increase in sea levels and the subsequent impact on our shorelines, climate change impact on the environment has direct and indirect adverse effects on the physical and mental health, quality of life, and well-being of humans.</p> <p>Seashores and beaches are extremely important, and their preservation is vital to our ecology, economy, and the well-being and health of our island's inhabitants.</p> <p>Please find attached the public comment from the Puerto Rico Clinicians for Climate Action on the <i>Puerto Rico Coastal Study (CSRM Feasibility Study)</i>. Do not hesitate to contact us for further details.</p> <p>PDF with formal comments: “PR_Coasts_CCA_comment”</p>	<p>PRIMARY CONCERN: TSP in Rincon and San Juan</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.</p> <p>A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.</p>

Number	Commenter	Comment	Corps Response
		<div></div> <p>January 5, 2021 U.S. Army Corps of Engineers</p> <p>The Puerto Rico Chapter of Clinicians for Climate Action (PR-CCA) is a group of physicians, from different medical specialties, whose principal mission is to educate clinicians and the communities about climate change and to advocate for climate solutions. We believe that climate solutions are human health solutions. And to be effective, these solutions require collaborative work involving key partners in representation of all the different areas of our society (6).</p> <p>Climate change is an undeniable problem and represents a global public health emergency. The science supporting the association between climate change and adverse health outcomes, especially among the most vulnerable groups, is robust. From the increase in the frequency of extreme weather events to the increase in sea levels and the subsequent impact in our shorelines, climate change impact on the environment has direct and indirect adverse effects on the physical and mental health, quality of life and well-being of humans.</p> <p>Seashores and beaches are extremely important. The state of our beaches in Puerto Rico affects our economy including tourism, local recreation, the fishing and boating industries, and the transport of goods (4). Climate change is associated with increased frequency of extreme weather events, such as the 2017 hurricanes Irma and Maria. According to NOAA, beaches serve as a buffer against the waves and the winds during hurricanes and serve as habitat for multiple plant and animal species, all of which are part of the ecological balance our lives depend so much on. All actions and efforts to remediate and mitigate the effects of climate change, including the erosion of our coast line, must have human health and the ecology at its center.</p>	

Number	Commenter	Comment	Corps Response
		<p>The proposed plan by the U.S. Corps of Engineers to reduce storm damage to properties and infrastructure from waves, flooding, and erosion in Puerto Rico, includes</p> <ul style="list-style-type: none">• beach renourishment• stone revetment• breakwater field in combination with beach renourishment <p>Climate change has aggravated the effect of waves, coastal flooding, and swells, for which the above structural alternatives were recommended. However, other alternatives need to be evaluated that take into account the impact on coastal habitat, environmental quality, recreational use of the beach (physical and emotional health), and economy (such as local fishing), in accordance with the National Environmental Policy Act (NEPA). <i>Preserving our beaches is essential</i>, not only because they are an integral part of the region’s identity and culture, but also because visiting the beach has multiple health benefits including decreasing anxiety and stress, improving hormone regulation, providing opportunities for exercising and the production of vitamin D, among others.</p> <p>The structural alternatives mentioned in the plan (TSP) take into account <i>solely</i> the benefit of controlling the impact of coastal flooding, waves, and erosion. For example, in the case of Rincón, the stone revetment would lead to the elimination of the beaches, which are the main attraction of this region.</p> <p>We recommend that the following natural solutions, which take into account the effect on our environment and human health, be considered, as stated in NEPA policy:</p> <ul style="list-style-type: none">• natural green infrastructure and living shoreline concept• planting of coastal wetlands• development of coral reefs• Sand dune development with planting of stabilizing species	

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		<p>Multiple studies have shown that these natural solutions on their own or combined with some structural alternatives are more cost effective than structural alternatives alone. Various governmental agencies have changed their public policy in accordance to these findings (1). Most importantly, these natural solutions improve water and air quality, coastal habitat, and help fight climate change.</p> <p><u>References:</u></p> <ol style="list-style-type: none">1. FEMA ends policy favoring flood walls over green protections https://www.eenews.net/stories/10637162532. Miami-Dade wants mangroves and islands as storm protection instead of 10-foot walls https://www.miamiherald.com/news/local/environment/article245085975.html#:~:text=Environment-,Miami%2DDade%20wants%20mangroves%20and%20islands%20as%20storm,instead%20of%2010%2Dfoot%20walls&text=The%20federal%20government%20plan%20to,from%20drowning%20the%20Magic%20City.3. Understanding Living Shorelines https://www.fisheries.noaa.gov/insight/understanding-living-shorelines4. National Atmospheric and Oceanic Administration https://oceanservice.noaa.gov/facts/ocean-human-health.html5. US Environmental Protection Agency https://www.epa.gov/beaches/learn-beach-basics6. American Psychological Association: The role of psychology in the preservation of the planet Using psychological science to understand human behavior and inform climate change mitigation. https://www.apa.org/international/pi/2018/06/preservation-planet	

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138	Ruben Frontera Jan 6, 2021	<p>I would like to express my comments to the plan presented / described in the newspaper El Nuevo Día in the section "Environment Today of the January 3, 2010 edition, by Gerardo E. Alvarado.</p> <p>My name is Rubén Frontera Benvenuto, and I own a residence in the Corcega sector of Rincón. I bear witness to the damage to the coast of Corcega Beach in this area. Erosion has been greater, resulting in loss of property, damage to others, not least, the loss of the shore (sand) that we all enjoy for so long. In fact, it is very joyful to know that there are initiatives for the mitigation and recovery of the coasts of Puerto Rico, especially that of the beaches of Rincón. This, for the benefit of structure owners, as for the general public (local and tourists).</p> <p>Reading the cost analysis report of alternatives to mitigate damage to the coastal infrastructure of Rincón, Puerto Rico, January 2018 (DOI.13140/RG.2-2-21147.62247 (thesis report) I am comforted to know that we have resources from our island addressing this problem, and providing ideas and solutions leading to the preservation of our shores. I am strengthened by the fact that Rincón is one of the areas served and considered for the allocation of federal funds to carry out projects leading to the control of erosion and restoration of beaches impacted by past atmospheric events).</p> <p>I can read that, in the case of suggestions for the coastal area and beaches of affected areas in San Juan, they are somewhat different from those of the Rincon area. I notice that the suggestions of the San Juan area include the replenishment of sand, and a stone breakwater inside the sea. That is, and if I could understand the report well, I notice that the suggestions and recommendations applicable to the coastal area of Rincón do not serve the part of the restoration of the coasts, or rather, the return of sand to the shore, as part of the restoration of the original environment, and for the enjoyment of all. In the Case of Rincon, only the revetment on the shore. This doesn't make sense to me. On the contrary, although it can promote stopping erosion, it leaves us a totally useless area, with the potential to create future damage and problems in time to the shore, depth of it, and the irreparable loss of tourism, and the enjoyment of the sand shore. In other words, a useless beach.</p> <p>Of course, I'm not an expert in this field, nor do I pretend to be. It is only my appreciation of what would happen in Rincon if a proper restoration is not done.</p> <p>I am made available to you to participate in future for a, being part of action and solution, not inaction and the problem. I thank you all for taking into account the problem of erosion, and loss of beaches in the area of Rincon, city of beautiful sunsets.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
139	Victor Torres Jan 6, 2021	<p>Give more time to the PR people to decide what to do with our island.</p> <p>Is our island not yours!! Get out of the island now and give us money for the use of our island for your interest here for more than 100 yrs.</p>	<p>PRIMARY CONCERN: Requesting review time extension</p> <p>Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.</p>
140	Madeline Ramos Jan 6, 2021	<p>I just found out about this project today while I was reading the Newspaper. I am a resident of Rincon and request an additional 30 days to evaluate and comment on the project. I need to know where to get a copy of it. Was it send to the municipality?</p>	<p>PRIMARY CONCERN: Requesting review time extension</p> <p>Jan 13, 2021 – Carolina: Thanks for your message. All the documents are posted on the study website: https://www.saj.usace.army.mil/PuertoRicoCSRMEasibilityStudy/</p> <p>Look at the right-side Tab with the Downloadable Resources.</p>
141	Lisa Wolter Jan 6, 2021	<p>I want to know the details and options related to the existing problem of erosion of the coasts of Puerto Rico and the surrounding buildings. I would appreciate your consideration of this request.</p>	<p>PRIMARY CONCERN: Requesting review time extension</p> <p>Jan 13, 2021 – Carolina: Thanks for your message. All the documents are posted on the study website: https://www.saj.usace.army.mil/PuertoRicoCSRMEasibilityStudy/ Look at the right-side Tab with the Downloadable Resources.</p>

Number	Commenter	Comment	Corps Response
142	Heriberto Mende Jan 6, 2021	We want to continue to have the beaches of Rincon. They are a great heritage; it gives us a space to relax and preserve our physical and mental health. In addition to the tourist attraction it has.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
143	Pedro Luis Nieves-Oficina Medica Jan 6, 2021	Regarding comments about coastline management throughout the western/northern coast of Puerto Rico (specifically Rincón, Puerto Rico): this area will be forever affected for the prime sport activity of surfing since shorebreak will be altered. This area has hosted worldwide surfing activities, is and is expected to remain one of the world’s top surfing spots for elite as well as non-competitive water sportsmen. From my standpoint as a citizen, physician and active water sportsman I remain confident that this comment will be taken into consideration as to the breadth of consequences should plans for coastline management in the Rincón area are forwarded without remorse to this very specific yet very sensitive issue.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
144	Joan Asencio Jan 6, 2021	I would like to request a 30-day extension to comment on USACE projects, particularly those that would be being carried out on Rincon beach.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
145	Manuel Gonzalez Jan 6, 2021	PDF with formal comments: “PR Coastal Study english version PDF”	PRIMARY CONCERN: TSP in Rincon Thank you very much for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.


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		<p>January 6, 2021</p> <p>Puerto Rico Coastal Study, Rincon PR</p> <p>For many months the United States Army Corps of Engineers has been evaluating the serious situation of coastal erosion on the beautiful town of Rincón. The intention they presented to us was to determine the viability of allocating congressional funds to attend, minimize or resolve the serious situation that Hurricane María in September 2017 brought us forward.</p> <p>Those of us who grew up enjoying the coasts of Corcega, Barrero and Pueblo are greatly affected by having witnessed the deterioration of our beautiful beaches. For the 80s, the amount of dry sand on our beaches was our patio where we enjoyed playing sports, sharing or just enjoying the landscape. That splendor, accompanied by many other resources, made it possible to make Rincón a place of high interest for local and international tourists and, unfortunately, for unscrupulous investors willing to convince agencies with juicy gifts or some creative strategy to approve construction permits in places that according to Experts said, it should not be built because in the near future we would have irreversible effects.</p> <p>The reality is that for natural reasons, bad local or global decisions, or whatever reason, we have witnessed the reduction of sand space and see how the sea was approaching until today we only see the sea tripping over the coastal and beach less properties. Who is to blame? We cannot point to anyone, but we could see that there was a ray of hope when we found out that scientists were presenting correct alternatives to improve or perhaps even correct the serious situation. We were excited to know that the University of Puerto Rico, from Mayagüez and with protagonists who are part of our community, were part of that design model.</p> <p>Even more so when the USACE, in its study, determines that Rincón was the place in the west where it should be invested to address the problem of coastal erosion. Then it comes out that the geographical space where the dream project was to be developed was quite limited, from the Quebrada Los Ramos to in front of the Victoria del Mar Condominium in the Córcega sector. So far, the hopes of Rincoeños, beach and conservation lovers and those of us who see Rincón as the leader of western tourism were celebrating. Then we get the WALL where we could crash as people, or we could jump over it if we unite as a people.</p> <p>The USACE wanted to show that if there were sufficient public access to the beach, it was right to invest in the shoreline reconstruction project. Construction of artificial reefs at a certain distance from the coast and re-nourishing the impacted area with sand. For some reason, now they just want to allocate some budget as a matching of funds to deposit rocks along the coast where at some point a promising coastal reconstruction project was envisioned. We could mention that the Municipality and the Department of Natural and Environmental Resources crossed their arms and did not address the matter with the seriousness and haste that it should</p>	



Number	Commenter	Comment	Corps Response
		<p>have. It is important to mention that with letters to get out of trouble, situations like this are not resolved. We could also think that because Puerto Rico is just a territory, our problems are downplayed. Perhaps the irresponsibility of insurance companies that have not paid for the demolition of destroyed properties on the coast. Maybe the thought that spending money in Rincón is wasting money because it is not San Juan. In short, we could spend 2021 searching for culprits and creating conspiracy theories. The reality is that we don't build that way.</p> <p>There is still hope of convincing the President of the United States, the Congress of the United States, the Fiscal Control Board, the Governor of Puerto Rico, the Legislative Branch of our country and the Mayor of Rincón that the right thing is not to throw rocks right at the end of the beach. Throwing rocks is what we have seen for the last 12 years, which has been highly criticized by experts and sometimes penalized by agencies. Throwing rocks is a bad remedy that has been more than proven. We could redefine the famous definition of insanity "Doing the same thing expecting different results." History shows us that if we do not know about it, we are destined to stumble over the same stone many times. This, it seems, is what the United States Government wants to do. I mention again that at this point the reasons pass to a second term. Now the important thing is too unite to have a single voice and convince everyone who needs to be convinced that WHAT IS RIGHT, SHOULD NEVER BE SUBSTITUTED WITH WHAT IS CONVENIENT.</p> <p>With this writing, not at all scientific, but with an overdose of love for my people, commitment to the environment and the conviction that I am doing the right thing, I hope to motivate my people to join in a fight for the right thing and take the message to the USACE , Congress and government of Puerto Rico. Our message is that the correct project for Rincón is the construction of artificial reefs as suggested by the scientists and that the affected coast be fed with sand.</p> <p>Thanks</p> <p>Manuel González Figueroa 3548 calle Ajaccio Rincón, PR 00677 manuelantonio.pr@icloud.com</p>	

Number	Commenter	Comment	Corps Response
146	Javier Aviles Jan 6, 2021	I want to know more about the problem of the beaches I have mentioned before and everything is left in nothing, I live in Rincon and the situation has accelerated.	PRIMARY CONCERN: Requesting information Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
147	Otto Flores & Alejandro Moreda & Rufino Vega Jan 6, 2021	<p>My name’s Otto Flores a member of the surf community in Puerto Rico among the numerous local residents, business owners and interested parties that rely upon the coastal resources in the focus areas identified by the USACE Puerto Rico Coastal Study for economic and recreational use in connection with beach and water sports, including sunbathing, swimming, surfing, paddle boarding, and kite surfing, among others. I am very concerned as to the potential impacts that the Tentatively Selected Plan identified in the Draft Integrated Feasibility Report and Environmental Assessment may have on the coastal resources and my ability to continue using the beach and the ocean for the activities previously described. I am also concerned with the potential social and economic consequences of the Tentatively Selected Plan and how it may encourage the historically unsound development of the coastline in Puerto Rico. A robust plan like the one proposed will affect our coastline indefinitely considering the constant swell and trade winds bouncing off the Puerto Rico trench. These regions provide endless economic opportunities to the local community and the damage to existing ecosystems will be Irreversible.</p> <p>Given the above and after careful consideration, I would like to express my support to the preliminary comments submitted by the Román-Más Foundation through their legal counselors, Lippes, Mathias, Wexler and Friedman LLP, concerning the Tentatively Selected Plan and their petition for additional time for public comments. The 45 day period for public comment on the Study with Appendixes that runs in the hundreds of pages, during a global pandemic and covering major holidays including Thanksgiving, Christmas, and Three Kings’ Day (also known as Epiphany), is inadequate and severely limits the ability of the affected public to review and comment.</p>	PRIMARY CONCERN: TSP in Rincon and Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
148	Leslie Valle Jan 6, 2021	In opposition to the project I express my concern as a resident of the area. The beach is for access to all and not to be privatized.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
149	Jonathan Martinez Jan 6, 2021	Mi name is Jonathan Martinez, I am planning into buying property in Rincon, I am very worried about the erosion that is going on in many parts of Puerto Rico and I do want a sustainable solution. I just found out about the draft Integrated Feasibility Report and Environmental Assessment report. Many people in Puerto Rico do not speak or read English, so in general we need more time to actually be able to read the report and perhaps translate it so other people can comment on the proposed solution.	PRIMARY CONCERN: TSP in Rincon and Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
150	Jose Gaya Jan 6. 2021	Attached letter and presentation related to erosion control technologies for Puerto Rico’s Coastlines.	PRIMARY CONCERN: Providing information Thank you for your comment.
151	Niria Bermudez Jan 6, 2021	I'm a Puerto Rico citizen and am asking for an additional 30-day term to submit comments to the projects concerning various important coasts. These projects where not greatly publicized so not many Puerto Ricans are aware.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
152	Carlos Ortiz Jan 6, 2021	I would like to respectfully request a 30-day time extension on the comment/question period for this project. The holiday and pandemic period have made the process of reviewing and commenting difficult. I hope you consider this request.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
153	Irma Ruiz Jan 6, 2021	Hope these first days of 2021 find you safe and with health. Enclosed is Scuba Dogs Society's letter with our comments pertaining the P.R. Coastal Study Feasibility Report and the supporting documents we endorse. PDF with formal comments: “SDS Letter to USACE_Jan 2021docx”	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.

Number	Commenter	Comment	Corps Response
		<div><div></div><div><div><div>Junta de Directores</div><div><div><u>Comité Ejecutivo</u></div><div>Presidenta Irma T. Ruiz</div><div>Vice-Presidente José J. Terrasa Soler</div><div>Tesorera Gloria Ruiz Pastush</div><div>Secretario Herman Colberg</div><div><u>Oficiales</u></div><div>Ariel E. Lugo</div><div>Alberto E. Martí</div><div>Fernando Silva</div><div>Francisco De Jesús</div><div>José Fernández Romeu</div><div>Lara Montilla</div><div>Lyvia Rodriguez</div></div><div><div>P.O. Box 363352 San Juan, PR 00936 787-454-4246 www.scubadogsociety.org</div><div><div>VISION: El ser humano en perfecta armonía con la naturaleza.</div></div></div></div><div><div>VIA EMAIL: PuertoRicoCoastalStudy@usace.army.mil</div><div>January 6, 2021</div><div>Ms. Angela Dunn US Army Corps of Engineers Jacksonville District Jacksonville, Florida</div><div>Dear Ms. Dunn and team members:</div><div>We appreciate the invitation to express our recommendations on the <i>Puerto Rico Coastal Study: The Integrated Feasibility Report and Environmental Assessment Report</i>, dated November 20, 2020, prepared by the US Army Corps of Engineers (USACE). Said document enumerates a series of actions proposed for coastal erosion control in the municipalities of Rincón and San Juan, Puerto Rico. This communication articulates our position on this coastal, social and environmental project, which is critical to the future of Puerto Rico.</div><div>Scuba Dogs Society (“SDS”) is a 501(c)3 non-profit organization created in 1996, whose mission statement is to support human development in perfect harmony with nature. As such, part of our work is geared to improving Puerto Rico’s coastal and aquatic environment. SDS, and its 10,000+ volunteers across our islands, carry out many cleanup activities, including the annual International Coastal Cleanup, sponsored globally by the Ocean Conservancy. Our efforts also include educational activities, data collection and reforestation initiatives with the aim of creating a harmonious relationship between humans and their social-ecological environment.</div><div>SDS has concerns about the adequacy of the planning process carried out by USACE and the coastal erosion control measures being proposed in Rincon and San Juan. First, we were not given sufficient time to evaluate and provide comments on these measures. It is simply impossible to provide thorough comments and recommendations on a project of this magnitude in a couple of days.</div><div>Second, some of the proposed erosion control measures, particularly the indiscriminate rock revetments in Rincón, actually eliminate or put into more danger miles of existing beaches that are crucial to the livelihood of the community and its tourism industry. For a project of this scale in such important beach areas, USACE should integrate measures that not only protect private property near the coast but improve its beaches and its coastal ecosystems from further damage. These areas are critical to hundreds of thousands of Rincón and San Juan residents and millions of visitors year-round.</div><div>Our concerns have been raised and expounded by other organizations, including by the Sea Grant Program and by the Puerto Rico Landscape Architects Institute. We hereby adopt by reference their respective position statements on USACE’ proposed measures.</div></div></div></div>	

Number	Commenter	Comment	Corps Response
		<div><p>Finally, we invite you to consider whether the actions presented in USACE’s Report represent innovative and integrated solutions that truly protect our beaches and coastal environment. As presented, the proposed measures, particularly in Rincón, are strictly geared to protect private property near the coast, but not its beaches or coastal environment. Puerto Rico’s social-ecological landscape has suffered dearly the consequences of a narrow-minded approach in the planning process of its infrastructure. Therefore, we urge your team to make sure that your decisions help save and expand the beaches and coastal ecosystems we currently have to ensure its existence and enjoyment by our society for many decades to come.</p><p>We trust that you will seriously consider our concerns and those of the organizations we have mentioned in this letter (see annexes). We are available to discuss with you this matter in greater detail at your convenience.</p><p>Cordially yours,</p><p>Irma T. Ruiz President</p><p>P.O. Box 363352 San Juan, PR 00936 787-454-4246 www.scubadogsociety.org</p></div>	

Number	Commenter	Comment	Corps Response
154	Rafael Rosa Jan 6, 2021	<p>Please find questions to the project in reference. PDF with formal comments: " IFR-EA 202011_ Questions 20210106"</p> <p>January 6, 2021</p> <p>U.S. Army Corps of Engineers, Jacksonville District ATTN: Angela Dunn 701 San Marco Blvd. Jacksonville, Florida 32207-8175 By email: PuertoRicoCoastalStudy@usace.army.mil</p> <p>Re: Puerto Rico Coastal Study - Draft Integrated Feasibility Report and Environmental Assessment; Dated: November, 2020 Questions to Published Information</p> <p>Dear Angela Dunn:</p> <p>After reviewing the Draft Integrated Feasibility Report (IFR) and Environmental Assessment (EA) prepared by the United States Corps of Engineers (USACE) we have the following questions to the proposed action based on the information provided in the documentation published (Puerto Rico CSRM Feasibility Study (army.mil)).</p> <p><u>Information provided in IFR and EA</u></p> <p>Section 2.3.3 (Available Sand Sources) – Identify four sand sources for Condado beach nourishment. Two of them located offshore of Luquillo and Río Grande municipalities. However the document did not identified the final source of sand for Condado beach nourishment. It is important to mention that documentation included as part of the IFR and EA identified erosion problems in Luquillo shoreline. As indicated in document Luquillo shoreline has high background erosion rates and is highly exposed to erosion during storm.</p> <p><u>Questions to Information Provided in the IFR and EA</u></p> <p>Based on the information provided in the IFR and EA we have the following questions:</p> <ol style="list-style-type: none">1. Which will be the final sources of sand?2. If Luquillo offshore sources are selected, please include/provide the following evaluation and studies to continue evaluation of the Draft IFR and EA before a FONSI is signed by the USACE.<ol style="list-style-type: none">a. Effects in the flora and fauna (special emphasis in the endangered species).b. Effects in Luquillo and Río Grande Municipalities shorelines erosion rates. Includes in the evaluation the potential effect in the shallow costal island and reefs located north of Playa Fortuna and Punta Las Picuas.c. Effects in the low income communities (Ex. Playa Fortuna community).d. Identify the direct, indirect and cumulative impacts in the aquatic and shoreline ecosystem.e. Include the cost of sand extraction in the proposed action cost analysis. Only Juncos quarry was used to estimate cost. <p>We strongly suggest continuing consultation with government agencies pursuant to applicable laws if offshore sources are selected.</p> <p>Regards,</p> <div><div>Rafael Rosa-Castro rrosa@trcepr.com</div><div>Digitally signed by Rafael Rosa DN: cn=Rafael Rosa, o=TRCE, ou, email=rrosa@trcepr.com, c=US Date: 2021.01.06 16:41:00 -04'00'</div></div>	<p>PRIMARY CONCERN: Sand sources</p> <p>Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>The analyses of the sand sources may be found within the Geotechnical Appendix, however the estimated volume of sand needed for the revised tentatively selected plan (TSP) is much more limited than the previous TSP.</p>

Number	Commenter	Comment	Corps Response
155	Agnes Ayuso Jan 6, 2021	I join the senator for the Mayaguez Aguadilla district, Ada García Montes, in the urgent request to the United States Corps of Engineers (USACE), to extend for 30 days the commentary period for the Integrated Report on Viability and Environmental Assessment on the coasts of Puerto Rico.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
156	Nydia Colon Jan 6, 2021	Request for the comment period for the review of the Integrated Feasibility and Environmental Assessment Report on the coasts of Puerto Rico to be extended for 30 days.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
157	Ari Maniel Cruz Jan 6, 2021	I am in the petition of 30 more days to comment on the project destined for the coast of Rincón to combat erosion. It's an issue that deserves more time and I join that request	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
158	Jacob Elmstrom Jan 6, 2021	<p>Ms. Dunn or to whom it may concern, please read this email to the bottom. I have great reservations about writing this Email as I am a great admirer of the public works of the USACE but what is being proposed must be stopped rethought and taken in another direction. I can give you the answers that your missing so we can all as a community both local and federal move ahead for mutual benefit.</p> <p>My name is Captain Jacob M. Elmstrom. I am currently a First Class Harbor Pilot in San Juan Harbor. I hold an unlimited USCG Masters license Oceans, and a Bachelor of Engineering in Naval Architecture from the State University of New York Maritime College. I am also a 34 year resident of Rincon a small town on the west coast of Puerto Rico. Like many before, and after, I fell in love with Rincon and made my life here when I was not traveling the world as a merchant marine officer. I am married and father of three children.</p> <p>Several years ago I was asked to come to your Simulator facilities in Mississippi to prove concept on the different possibilities of taking much larger Gas Tankers through a widened Army Terminal Channel. It was a pleasure to work with your staff.</p> <p>Economics: your “study” or report goes into less detail than is necessary for the public to make a proper determination. What if we look at the total Gross domestic product of Rincon’s economy as a function of linear beachfront lost? Your Revetment which guarantees that the sand is permanently lost would kill 25% of Rincon’s Economy. How much is a beachfront rental (property) worth with no beachfront?</p> <p>Historical trends: It became clear in the late 1980’s that a massive increase in flooding was occurring in certain Neighborhoods and that a solution would have to be found. The solution was the widening and deepening of a small creek, the Quebrada los Ramos. This solved the SECONDARY PROBLEM of flooding, but nobody at any of the 13 Government agencies of the Joint Permitting Process (including the USACE and DNRA) bothered to ascertain why was there so much flooding all of a sudden in the late Eighties? What caused the initial exponential increase of flooding that drove the project of enlargement of the Quebrada los Ramos.</p> <p>Sugar Cane Production in Rincon: This can be a long subject, not only with the for the actual planting and cultivation of the cane and its byproducts, but also, for those of us who live in Rincon, the socio economic effects. I will be brief and limit this to the water intensity of the dominant crop of sugar cane in Rincon.</p>	PRIMARY CONCERN: TSP in Rincon and How the Quebrada Los Ramos improvements induced erosion Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.



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		<p>At one time Most of Rincon’s farmable land was planted in sugar cane. Current roads (the main roads of Rincon such as 413 and 115) were dedicated to train transport of sugar cane stalks to processing plants (called Coloso’s) in Aguada. To say that 90% of Rincon was planted in Sugar Cane could be an oversimplification as I didn't have enough time to get exact figures by year, but I was here then and saw planted Sugar cane as far as the eye could see. Rincon’s climate is perfect for sugar cane. An extremely wet rainy season when Sugar Cane was planted grown and harvested , followed by an extremely dry season when the fields were burned off and prepared for the next year or years.</p> <p>Sugar Cane production abruptly stopped in Rincon in the late eighties though. The loss of Government subsidies, cheaper places to grow cane, the crash of commodity prices, the reason is unclear. WHERE THERE IS NO DOUBT is that a significant portion of the land area of Rincon, planted with one of the most worlds most water intensive plants, was no longer absorbing the effects of heavy rainfall for several months of the year (5 months?). So then the question becomes: How much water was now not being absorbed in plants but spilling out into roads, quebradas make shift pipes and drains?</p> <p>3000 cubic meters of water for one ton of Sugar Cane is the figure sometimes used. This is impossible for anyone to ascertain but an estimate must be made. In this part of the world (Cuba, Dominican Republic, Puerto Rico) that was a figure used frequently.</p> <p>3000 x 1,000 tons/yr = 3,000,000 cubic meters!!!!!!!</p> <p>3000 x 10,000 tons/yr= 30,000,000 cubic meters!!!!!!!</p> <p>What was the yearly output of sugar cane in Rincon?</p> <p>The cube root of 30,000,000 cubic meters is 310.72 and would be a box approximately 1000ft long x 1000ft wide x 1000ft high. The exact numbers (3000cubic meters, how many tons harvested) of course are unknown and therefore debatable, but to blame this problem on “climate change”, or “sea level rise” as stated far to frequently in your various reports is quite simply RIDICULOUS.</p> <p>Hurricane Maria certainly exasperated the problems on our coastline, but without a doubt it was not the only cause of erosion on this coastline.</p> <p>Process of erosion: This process is fairly simple. Heavy rainfall in the rainy season pushes sand from beaches out to sea by means of concentrated projects haphazardly arranged over time by various Government Agencies. The Quebrada los Ramos and all quebradas, rivers, all roads that terminate at the beaches, drains, culverts ditches dug during the sugar cane era, basically any structure that collects water and then dumps it onto sand is contributing to the erosion and the destruction of our coastline.</p> <p>One of these water collection points is the parking lot at the Balneario or public beach. The outlet to the beach is what used to be a handicapped access ramp. If you try to use the handicap ramp today you would stand a good chance of actually becoming handicapped.</p> <p>During the winter season (high wave season) the sand is pushed back and many beaches not only regain the sand lost but sometimes increase and accrete sand. The problem and loss of sand budget occurs when during rainy season the sand is off in the nearshore and is taken by hurricanes or tropical storms</p>	


Number	Commenter	Comment	Corps Response
		<p>into deeper water where the sand cannot comeback as a result of the usual forces. Cold fronts from the west and south of Florida have profound effect on erosion in “reach B”. As one local diver told me years ago “the sand goes over the edge like a waterfall”. I personally witnessed this also. Any cursory glance at a nautical chart of Rincon shows the depth curves clearly. The closest the curve comes to the Rincon coastline is in the vicinity of the outlet to the Quebrada los Ramos. The Quebrada los Ramos must “remove the sand plug”(erosion of the beach) in its entrance to perform its primary design function.</p> <p>All of these government projects are systematically eroding the coastline (pushing sand from beaches to offshore and nearshore) at various locations. This is not catastrophic on its own as the sand comes back most years if we are not hit by major named storms or cold fronts. If we are hit by any major named storm within 300 miles or a cold front from the west, while the sand is in the nearshore area of the coastline, we lose significant amounts of sand budget to deep water and the inevitable loss of beachfront.</p> <p>Studies: The study by Morelock in 1975 correctly identified four separate reaches (A,B,C,D) in Rincon and is important to note. This setup is still being used and was used in every study that comes after it. It is well worth reading in case anybody has any doubts that the “Erosion Problem of Rincon” started with Hurricane Maria.</p> <p>The non Government studies performed by Thieler and others in 1991, 1994. Should be dismissed and not used. I called Thieler in 2004 and questioned him about error rates and Differential correction stations. At question by many in peer review was the rates of error in the study. As there was no differential correction station in Puerto Rico until 1997, necessary for the almost 18 meters of cumulative error claimed. Thieler blames a small marina (and there were definitely problems with the operation there) for the erosion in Rincon but then systematically ignores every single Government project on the coastline? Why as a scientist would you do that? Possibly because the source of the funding was the Government? One must ask the question was Thieler solicited to provide a study that would corroborate convenient solutions for the Government rather than honestly look at ALL PROJECTS. The study draws diagrams that show various flow directions then makes claims that would require you to have sounded the bottom to justify. I questioned him about this and he replied “I used my best Scientific judgement.” No, the scientific method would have been better.</p> <p>Thieler study #3: after speaking to Thieler in 2004 he shows up unexpectedly in 2005 and gives a public meeting in Rincon sponsored by the Surfrider Foundation of Rincon. He claims to have completed “Bathymetric study”(or sounding the Bottom in laymen terms), and there is no more discussion of data generated by DGPS. The vague term of GPS is used but again the error rates approach 20 meters and that can’t be used to measure beach erosion for a beach that today measures 15-20 meters and we can show historical pictures showing almost no change. He correctly but vaguely avoids any discussion of Government projects causing erosion by merely suggesting “ it is clear that their are multiple sources of erosion.”</p> <p>Solutions: The dirty secret of the beaches in Rincon is that the norm is accretion not erosion and therefore the beaches fix themselves, as long as they are not pressured by land based drainage projects. Clearly we must find a way to remove the water from Drainage outlets like the Quebrada los Ramos AND keep the beach in place. A phased array of pipes five high and five wide totalling 25 pipes could be a way to bleed off the rising level in normal and extreme rainfall. The Quebrada los Ramos must</p>	


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		<p>erode the beach significantly to perform its primary design function, this must change. The direction must also change to face southerly in the direction of net lateral drift.</p> <p>The other outlets like erosion at beachside road terminations are obvious sources of erosion and need catch basins and under beach piping to leave the beach in place and take terrestrial source rainwater directly to the sea, and again, leave the beach in place. Planting with vegetation on either side of piping will help stabilize the beach as well.</p> <p>In the area designated reach B the construction of a revetment guarantees the loss of a significant amount of linear beachfront yet doesn’t alter in any way the root causes of erosion, so erosion will continue to occur. This is a very bad idea and I hope will be opposed by all living in Rincon.</p> <p>A beach replenishment project (this requires a much longer discussion) is necessary to rehabilitate reach B. Sources of sand should be identified here in nearshore Rincon and used to replenish our beaches. After all its our sand. There are clear sources of sand that have been correctly identified in the current report but there is one source that’s missing.</p> <p>The small marina in Rincon needs periodic dredging to remain open. The town boat ramp also requires dredging and a small navigation channel to be maintained. These are necessary in Rincon to improve our local economy. Also the US Border Patrol, Fura and other law enforcement agencies all used this area in the past as a base of operations to combat illegal immigration and drug smuggling. Having a small USCG boat as a first response vessel might have saved fisherman recently killed / missing. It is time to stop punishing Maritme Rincon for the past failures at the Marina. The beneficial uses of sand are well documented and taking sand from the marina/ramp area and bringing to the Balneario (public beach) to gain 30 meters of perpendicular beach out into the ocean. After that sand can regularly supplement reach B as needed in a much smaller low impact operation.</p>	
159	Ivonne Raffucci Jan 6, 2021	<p>Having read the article Rincon could lose its beach due to a federal project that seeks to protect the infrastructure of the area (28/Dec/2020) by Leandro Frabrizi Ríos of the Center for Investigative Journalism I make an opposition claim, re-consideration and re-evaluation to the project issue of mitigation and possible solution of erosion of Rincon beaches with stone rocks along one (1) mile of beach ranging from Sea Beach Colony to Stella Community.</p> <p>I understand that there are viable experiences and successful projects for mitigation to the well-known problem of erosion on the beaches of Rincón for decades. I propose that it be seriously considered and evaluate the possibility of a project of "T-Head Groins" for the control of erosion that exists in the Dominican Republic, the island of Corsica in the Mediterráneo and other places in the world.</p> <p>At the forum and conference, think of a Coastal Natural Events Resilient Corner, which I attended on Monday, December 11, 2017 organized by upR-RUM's Sea Grant Program, presented the scientific findings and viable solutions to the impact of Hurricanes Irma and Maria 2017.</p> <p>I refer in particular to three (3) presentations related to the solution of coastal erosion in Rincón in that forum:</p> <p>1. Fundamental Criteria for the Development of Resilient Communities and Infrastructure in Puerto Rico: Climate and Oceanographic Trends and Projections by Mr. Ernesto Díaz.</p> <p>2. County Reef, a Citizen Pilot Project to Save Lives, Protect the Coast and Increase Marine Life by Mr. Frank Inserni, Condado Reef, Inc.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>


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		3. Beach Nourishment as a Mitigation Alternative for Rincón's Eroded Coastline by Federico García Uribe. I understand that the relevant federal, state and municipal agencies in partnership can join genuine efforts to apply for, acquire and identify funds and embark on a project that has as a priority to protect the natural resource of our beaches that results in the protection of existing infrastructure in that maritime area.	
160	Margiemay Burgos Jan 6, 2021	Please concede an extension of 30 days for all parties concerned to issue comments. This project affects valuable natural and tourism resources of the island	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
161	Rafael Machargo – DNER Jan 6, 2021	Enclosed Please Find the Puerto Rico Department of Natural and Environmental Resources comments on USACE draft Integrated Feasibility Report and Environmental Assessment report for San Juan and Rincon Areas with its attachments. PDF with formal comments: " DNER Comments 1-6-2021"	PRIMARY CONCERN: TSP recommending revetments and Requesting review time extension Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report. We have appreciated the working relationship with DNER and feedback from DNER throughout the re-analysis leading to this draft report. We look forward to continued partnership with DNER through the remainder of the study.

Number	Commenter	Comment	Corps Response
		<div><div>GOVERNMENT OF PUERTO RICO Department of Natural and Environmental Resources</div><p>Wednesday, January the 6th, 2021</p><p>Colonel Andrew D. Kelly Commander and District Engineer U.S. Army Corps of Engineers, Jacksonville District</p><p>Dear Colonel Kelly,</p><p>I want to extend our sincere appreciation for your continuing support of coastal storm risk management in Puerto Rico. As you know, the U.S. Army Corps of Engineers, Jacksonville District (USACE), leads the development of two feasibility studies for Puerto Rico: (1) San Juan Metro – Back Bay and (2) Puerto Rico Coastal Study for San Juan and Rincón (the Feasibility Studies).</p><p>Coastal storm risk management is of great importance for Puerto Rico. Over 500,000 people live in flood-prone areas (FEMA zones: A, AE, AO y VE) at coastal municipalities, and 9,516 live in FEMA zones AE or VE exposed to storm surge or direct wave impact. Sea level rise is also a significant concern for coastal communities and the critical infrastructure on our Island located along or near the coastline. Storm events have increased in intensity and frequency in recent years, which is expected to continue. In addition to protecting the health, safety, and welfare of our residents and critical infrastructure, reducing coastal risks is necessary to maintain Puerto Rico's tourism industry, which is of great economic importance.</p><p>The Department of Natural and Environmental Resources (DNER), as the Puerto Rico non-Federal Sponsor, has worked together with the USACE project team and has actively participated in the development of both studies. The Draft Feasibility Studies have advanced to the point where alternatives to address risks at study areas are being discussed based on Beach FX and G2CRM model results. In the Puerto Rico Coastal Study, the USACE has identified a Tentatively Selected Plan (TSP) and is in the process of studying the impacts of and alternatives to that TSP under the National Environmental Policy Act (NEPA) through a draft Environmental Assessment (EA).</p><p>As expressed in our July the 8th, 2020 communication¹, the DNER has significant concerns that the various model assumptions, as well as alternatives considered by the Project Delivery Team (PDT), are inconsistent with our technical analysis and with Puerto Rico's environmental and beach/maritime zone protection policies. Specifically, DNER is concerned with the structural intervention (revetment) included in the TSP for the headlands at Punta Las Marías and Punta Piedrita and in Rincón, where sandy</p><p>¹ See attachment : "A"</p><div><div><p>• Carr. 8838 Km 6.3 Sector El Cinco, Río Piedras, PR 00926 • • San José Industrial Park, 1375 Ave Ponce de León, San Juan, PR 00926 • 787.999.2200 787.999.2303 www.drna.pr.gov</p></div><div></div></div></div>	

Number	Commenter	Comment	Corps Response
		<div>Page 2 January 6, 2021</div> <div>beaches are present and utilized by Puerto Rico's residents and tourists for recreation and other activities.</div> <div>Puerto Rico Regulation 4860 governs the administration of Puerto Rico's maritime-terrestrial zone. Installing revetments at points and headlands where beaches do not exist due to erosion or where sea levels have reached public or private properties is a water-dependent option approvable under DNER Regulation 4860 (1992, as amended). By contrast, and what raises the most significant concern for DNER, revetment at sandy beaches is not an acceptable option under Regulation 4860. Given environmental, beach dynamics, and socio-economic considerations, various structural interventions at sandy beaches (including at one of the sandy beaches where the TSP proposes a revetment) have been banned and/or rejected, and additional policy is currently under review for adoption at DNER. Beaches are an essential asset for Puerto Rico. Under our Commonwealth and local laws, they receive maximum protection, especially when other alternatives are available to achieve a given purpose.</div> <div>Policy Background</div> <div>Individual permit applications to protect coastal infrastructure have increased significantly after Hurricanes Irma and María (2017) and Winter Storm Riley (2018), severely impacting Puerto Rico's Northern and Northwestern coasts. In addition to proposed civil engineering options consisting of 1:1 rock revetment, frequently using undersized and underweight rock deposits, many desperate beachfront property owners have proposed to protect their properties using poorly analyzed and designed alternatives consisting of gabions, sheet-pile, and even an old practice of using 55-gallon drums filled with a mix of rock and concrete. As a result, in 2018, DNER Secretary issued a directive to the Permits Area banning the use of gabions and vertical seawalls on open waters. The ruling also established a prohibition to use boulders, rocks, and revetments of any kind that may affect sandy beaches and beach dynamics, particularly on highly visited touristic-recreational and/or sea turtle nesting beaches. This directive is in line with the many Commonwealth laws, regulations, and policies that prohibit (or severely limit) blocking access to and placing obstructions in Puerto Rico's maritime-terrestrial zone. The proposed revetments in Punta Las Marías, Rincón, and Punta Piedrita would violate that directive.</div> <div>DNER's policy limits short-term or emergency protection for beachfront properties facing risks after severe storms to sandbags and geotube-based options. Current DNER policy to address emergency protection needs at sandy beaches facing net or seasonal erosion is also applicable to long-term, more permanent solutions, such as some alternatives considered under the Puerto Rico Coastal Study. DNER is responsible for the administration of coastal public trust lands, submerged lands, and territorial</div>	

Number	Commenter	Comment	Corps Response
		<p>Page 3 January 6, 2021</p> <p>waters.² DNER is also responsible for protecting and managing the coastal zone, coral reefs, essential fish habitats, and coastal biodiversity and wildlife.³ Therefore, in addition to public safety, engineering, and economic considerations, DNER must ensure environmental protection of coastal habitats and trusted resources. Regulation 4860 is a body of enforceable policies of the Puerto Rico Coastal Zone Management Program (PRCZMP), also led by DNER. As part of the federal consistency review, Puerto Rico, through the Planning Board and DNER, must certify consistency with the body of enforceable policies of the PRCZMP. Also, DNER has initiated coordination with NOAA's Office for Coastal Management to adopt a new beach protection rule as part of a routine program change to the PRCZMP. Of note, the Puerto Rico Planning Board has previously denied certification for a revetment in one of the areas included in the TSP.</p> <p>Tourism and commerce in coastal municipalities are highly dependent on beaches and coastal assets. The tourism sector represents seven percent (7%) of Puerto Rico's total GDP and creates over 65,000 jobs.⁴ Over 90% of Puerto Rico's hotels and hospitality businesses are in the San Juan metro area and is a growing concern at the Rincón coastline. Therefore, beach protection in this area from the environmental, aesthetics and socio-economic perspectives is a high priority for Puerto Rico.</p> <p>Puerto Rico Coastal Erosion and Risk Reduction Alternatives selection</p> <p> DNER respectfully requests that in addition to the benefit-cost analysis and return on investment considerations; the USACE Jacksonville District project development team evaluates the TSP's compliance with PRCZMP enforceable policies (CZMA Federal Consistency), as well as with DNER's directives, which limit the use of structural protection (revetments) at sandy beaches as part of the environmental and socio-economic compliance analysis. Our Office for Coastal Management and DNER's Permit Area and the PR Planning Board Federal Consistency Office will support project team members during the requested analysis process. Where there are inconsistencies, we can work with the USACE to identify and assess appropriate alternative solutions.</p> <p>DNER also respectfully requests that the USACE Jacksonville reviews the storm damage assumptions used for the San Juan and Rincón coastline segments of the Puerto Rico Coastal Study. DNER is interested in further collaborating with the team but would need</p> <p>² Article 5(h), Puerto Rico Department of Natural and Environmental Resources Organic Act (1972, as amended). ³ Puerto Rico Coastal Zone Management Program (1978, as amended); Puerto Rico Coral Reefs Conservation and Management Act (Law 147, 1999); Puerto Rico Wildlife Act (1999); and associated regulation. ⁴ Puerto Rico Tourism Company (2018).</p>	

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		<p>Page 4 January 6, 2021</p> <p>additional support to integrate a physical oceanographer, a structural engineer, and an economist to examine storm damage criteria used as part of the Beach FX model. We understand that certain damages may have been underestimated, affecting the economic analysis and feasibility of beach nourishment and protection at the San Juan and Rincón coastlines' sandy beaches.</p> <p>Public Participation</p> <p>Due to the government transition and the holiday season, the DNER the period from December the 10th, 2020 through January 6th, 2021 is not sufficient to allow full participation of the affected parties regarding the USACE draft Integrated Feasibility Report and Environmental Assessment report. Therefore, the DNER respectfully request the USACE to extend the comment period for an additional 30 days.</p> <p>I am happy to discuss any of these topics with you. Again, I much appreciate your leadership and support to address Puerto Rico's coastal erosion and storm risk reduction needs.</p> <p>Respectfully  Rafael Machargo-Maldonado, Esq. Secretary</p> <p>13</p>	

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162	Rolando Flores Jan 6, 2021	I'm a resident of Rincon. In my professional preparation, I have a BS in marine biology and environmental science, also I'm a General Surgeon. I would love to bring my opinion about the environmental problem we have in Rincon, but please, extend the period to bring our opinion; is for a real important cause.	PRIMARY CONCERN: Requesting information Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report.
163	Ramon Feliciano Jan 6, 2021	I am a resident of Rincon and by this means I wish to express my opposition to the project as proposed. I request that we be given additional time to know and understand your proposal and look for other alternatives that protect our beaches. Let's find other alternatives. Not the revetment and the rocks in Rincon.	PRIMARY CONCERN: TSP in Rincon and Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
164	Michelle Scharer Jan 6, 2021	Thank you for the opportunity to submit public comments to USACE provisional proposal for Rincón under the CSRM Feasibility Study. The preliminary decisions regarding the type of revetment is not supported, it would be preferable to install underwater reef structures with natural coral colonies that would grow to maintain shore protection over the long -term. The lack of action over the past 20 years, despite studies showing the trends in shoreline loss have brought us to this situation. Now we must pay the price to do it right and allow the natural deposition of sands from the nearshore areas, with the help of engineering and nature.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
165	Francisco Pereyo Jan 6, 2021	Attached please find my formal letter of public comment in support of the study. Also please find a list of 647 supporters and their comments. This list was obtained through a digital petition form in the digital platform chnng.org from December 25, 2020 to today. You can find the petition at: http://chnng.it/LHvRJrVV I will leave the petition open for now so additional supporters can submit their vote and comments. If you wish to obtain the list in the future don't hesitate to contact me. Thank you. PDF with formal comments:" comentario Estudio Costero USACE"	PRIMARY CONCERN: Supporting TSP in Punta Las Marias and Ocean Park Thank you for your comment and support. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.

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Number	Commenter	Comment	Corps Response
		<p>December 21, 2020</p> <p>US Army Corp of Engineers ATTN: Angela Dunn 701 SAN MARCO BOULEVARD JACKSONVILLE, FLORIDA 32207-8175</p> <p>RE: Community of Punta las Marías, San Juan, Public Comment to USACE Puerto Rico Coastal Study</p> <p>First, I would like to congratulate the US Army Corps of Engineers for their unprecedented effort to implement a coastal management program in Puerto Rico. As in most developed coastlines in the United States, Puerto Rico has severely suffered from coastal erosion in various widespread areas and has an urgent need for coastal management and planning. Similar efforts in other states have established prosperous coastal management programs that have positively impacted the environment, the economy, public benefit, tourism, and property value. One only needs to look at states like Florida, up through New York, Gulf of Mexico states, and west coast states to see the possibilities and benefits. We trust the USACE will conceive a comprehensive plan that fulfills all regulatory requirements and meets the public interest.</p> <p>Today's San Juan community and the coastal property owners have inherited an erosion issue which, although should have been assessed while developing the coastal urban area during the last 100 years, has very few current alternatives to solve. It is unreasonable to consider coastal retreat an alternative in the San Juan urban waterfront. Modern coastal best management practices offer viable alternatives to stop coastal erosion advancement, protect threatened property and infrastructure and nourish existing pocket beaches.</p> <p>Coastal erosion is most evident at the headlands, where seasonal sand migration is no longer evident, and the water's edge lies at the foot of properties and structures. Property owners and the community worry about the real threat of property and infrastructure loss, which is more than an individual issue, affecting overall property value and community curb appeal. The sandy beach has slowly retreated in the Punta las Marias headland since the 1960's. It began disappearing in the windward side of the headland, downwind of the Surfside Mansion Condominium breakwater. In the 1970's a sandy spit still existed at the headland point, off Emajagua Street. Today, the rocky shore stretches all the way west to Almendro street. Roughly half of the headland's shore has rock revetments and concrete debris installed by individual property owners, in most cases without planning, design and permitting. The other half have vertical structures, which aggravate the coastal erosion by refracting wave energy.</p> <p>Through the years, coastal erosion situations have been addressed individually to mitigate damage and protect life and property. Individual makeshift solutions have proved to solve the immediate problem but adversely affected adjacent coastlines. As a community, we acknowledge that large scale solutions must be implemented, for not only the individual, but the greater good of the coastal region. As a community we support the preliminary findings and recommendations of the USACE's Puerto Rico Coastal Study and hope it eventually becomes a reality.</p>	



Number	Commenter	Comment	Corps Response
		<p>Estimados vecinos,</p> <p>El Cuerpo de Ingenieros de los Estados Unidos acaba de completar la fase preliminar de un estudio donde ha analizado el estado actual de la costa de San Juan, desde Boca de Cangrejos hasta Condado, para hacer recomendaciones de cómo manejar la erosión costera. Este tipo de estudio nunca se ha hecho en Puerto Rico. Los resultados y recomendaciones de este estudio pudiesen demostrar la necesidad y establecer la dedicación de fondos federales para crear un programa de manejo costanero y los proyectos para controlar la erosión costera, la protección de las áreas afectadas y la nutrición de playas de arena.</p> <p>El estudio propone la protección de playas arenosas en Condado y Ocean Park con arrecifes o rompeolas y la nutrición de arena, y la protección de las puntas de tierra en Condado y Punta las Marías con revestimiento de las áreas erosionadas y las estructuras verticales que agravan la erosión. Los resultados tienen el potencial de salvar las playas, infraestructura y propiedades, trayendo un gran beneficio a la comunidad. Adjunto el link donde pueden leer más sobre el estudio:</p> <p>www.saj.usace.army.mil/PuertoRicoCSRFeasibilityStudy/</p> <p>El Cuerpo de Ingenieros está recibiendo comentarios del público sobre el estudio hasta el 6 de enero del 2021 antes de proceder con la fase de desarrollo del diseño de las recomendaciones preliminares. Nos compete a todos los vecinos de la comunidad apoyar el estudio y sus recomendaciones preliminares, así estableciendo el interés público de que se concrete un plan de manejo costanero, se controle la erosión costanera y se rehabiliten nuestras playas. Los comentarios públicos pueden ser sometidos por email a la dirección PuertoRicoCoastalStudy@usace.army.mil, o firmando la carta adjunta. Agradeceremos su apoyo para tener playa para el futuro.</p> <div><p>Francisco Pereyó PE, Lic. 23,468 #5 Almendro, Apt. 1A Punta las Marías 787-525-1532</p></div>	

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Number	Commenter	Comment	Corps Response
166	Bernice Padial Jan 6, 2021	I am an advocate for the beaches and coasts of PR and join the urgent request to the United States Corps of Engineers (USACE), to extend for 30 days the commentary period for drafting the Integrated Feasibility and Environmental Assessment Report on the coasts of Puerto Rico.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.
167	Yolanda Rivera Jan 6, 2021	I am asking 30 more days to save the beaches in Rincon.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
168	Charles Cole Jan 6, 2021	As a citizen and resident of Puerto Rico I ask for an extension of 30 days to evaluate the plan on the proposed work for the coast of Rincón and San Juan in relation to the erosion happening in these places.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and suggestion. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
169	Hector Alberto Gonzalez Jan 6, 2021	I would like to know if it is possible to do beach study in Joyuda, Cabo Rojo PR. In Punta Arenas beach and Playa Tres Tubos there is erosion in which the sand has apparently run from the coast to a reef that protects the beaches. I understand that in Jacksonville, FL they do dredging to re-locate sand towards the coast. I am not an expert on the subject, but I would like to know if such a procedure could be carried out in the Joyuda area for coast and property protection.	PRIMARY CONCERN: Requesting studies in Cabo Rojo (outside of the study area) Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. The Puerto Rico Coastal Study specifically developed recommendations within the study areas located in San Juan and Rincon, however the study acknowledges that these are not the only vulnerable areas to coastal storm damages in Puerto Rico.

Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
170	Cristina Ferrer Jan 6, 2021	I am not in agreement with the stone revetment along the coast of Rincon (Quebrada Ramos to Estella). I think first of all you have to clean the beach of all the debris created since Hurricane Maria in September 2017. Once the problem of removal of debris and collapsed properties on the beach has been solved, the next step should be the protection of the coast, which does not necessarily have to be by throwing stones to the coast. The stone revetment will impact negatively our beautiful village of Rincon. Rincon is famous around the world for surfing, our beautiful people and of course, our beaches. Rincon depends on tourism and I understand that this option of the revetment of the coast is not correct. It would greatly affect the shops, hotels and restaurants that are located in that area, as much as the community and its residents, making the value of their property devalue, the loss of jobs, reduction of tourism and visitors. As a resident of Rincon I believe that the beach should be nourished, by adding sand to the areas affected by erosion. In Rincon you can see beaches with large amounts of sand, which didn't used to be like this before hurricane Maria. I think that excess of sand can be used to nourish the affected beach, adding sand to the area. On U.S. shores such as New Jersey and Florida, they have opted for more viable options that don't include stone revetment. I think sand feeding is the right one to control erosion. Please help us restore our beaches not to eliminate them.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
171	Ada Ivelisse Garcia PR Senator Jan 6, 2021	Attached is the letter regarding my position about the draft of Integrated Viability and Environmental Assessment Report on the coasts of Puerto Rico. PDF with formal comments: "USACE – Letter"	PRIMARY CONCERN: TSP in Rincon Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. TThere is a new 30-day review public period for this re-release of the draft report. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon proposes to restore the sandy shoreline through acquisition of structures and property. Additionally, the proposal for Rincon has a native vegetation component. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.


Number	Commenter	Comment	Corps Response
		<div></div> <div>January 6, 2021</div> <div><p>Mrs. Angela Dunn USACE Jacksonville, Florida 32207-8175</p></div> <div><p>Dear Mrs. Dunn:</p><p>Receive an affectional greeting from the Puerto Rico's Senate, especially from me the Senator Ada I. García Montes.</p><p>In the past few days, the draft Integrated Viability and Environmental Assessment Report on the coasts of Puerto Rico, where the municipalities of San Juan and Rincon, Puerto Rico, have been included, has come before my consideration.</p><p>As a Senator I have heard the demands of residents, community leaders and environmental specialists who have presented us their concerns for the proposed project, which will impact a mile of beach in the village of Rincon.</p><p>As a resident of Rincon's municipality, I know the importance of implementing mitigation plans to preserve our beaches and manage the coastal erosion of the area. However, I cannot support an initiative which, despite its importance, it did not have reasonable time for comments and public discussion.</p><p>For the West of Puerto Rico and especially for Rincon, beaches play a leading role in the economic development of the region. These are fundamental to the recreation, economics, commerce and tourism of Rincon and the entire Aguadilla-Mayaguez District.</p><p>As a District Senator I officially express my opposition to this project because I understand that we can explore other eco-friendly alternatives that would allow the regeneration of the beach, such as the submerged breakwater within 100 feet from the beach or some other hybrid solutions that does not permanently affect the beaches of the area.</p><p>Finally, I want to thank USACE's interest to mitigate the erosion issues in our west region. I reiterate my willingness to collaborate in this issue and find solutions that ensure the safety of existing infrastructure and the preservation of our beaches and the environment.</p><div><p>Sincerely,</p><p>Hon. Ada I. García Montes Senator</p></div><div><p>El Capitolio Apartado 9023986, San Juan PR Teléfono: (787) 724-2030 WEB: WWW.SENADO.PR.GOV</p></div></div>	



Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix




Number	Commenter	Comment	Corps Response
172	Eva Cardona Jan 6, 2021	<p>It is the knowledge of all the Rincon residents that we face serious problems on our shores due to the threat of erosion. Tourism is the main attraction of our village and our beaches play a very important role in the economy of many homes. While it is true that we must take action and look for alternatives to combat the problem of erosion, armoring our shores with stone is not the best option. This would deprive us of the primary natural resource of our people, many families depend on fishing and tourism. Rincón has nature reserves designated and protected by the Department of Natural Resources.</p> <p>I understand that there are properties that are threatened by coastal erosion but eliminating the beach from these structures will make their value depreciated.</p> <p>Rincón has many people committed to the environment and many professionals who have studied various problems on our shores and worked to find solutions to them. I consider the right thing to do in this situation is to conduct a more extensive investigation and in conjunction with the Rincon residents (who are the injured) so the best alternative is selected for the benefit of all.</p> <p>I make myself available to assist in everything that is necessary during this process that concerns us all. Our beaches are an essential part of our life and heritage of our municipality. Beyond any economic interest, it should be a priority to conserve our natural resources in an optimal state and protect marine life.</p> <p>If you need volunteers to attend assemblies, meetings and/or proposal development, count on me.</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p>
173	Miguel Canals Jan 6, 2021	<p>Through this email I would like to formally express my opposition to the tentatively selected plan for the Rincon, PR study area of the PR Coastal Study. I have participated in several calls and webinars with USACE JAX personnel and have exchanged technical details regarding the study, and I will not go into those details in this email.</p> <p>The TSP of a mile long revetment is not an option that will be accepted by the community of Rincon, as you will see or have already seen from probably dozens of letters and emails (many in which I am cc'ed) of my friends and colleagues in which community members detail their opposition to USACE-JAX's TSP for Rincon. I strongly encourage USACE-JAX to work with community members and local experts on the formulation of an alternate plan that includes a hybrid approach combining detached breakwaters, small scale beach nourishment, and revetments along some critical sections of the coastline.</p> <p>The formulation of such a hybrid approach will only be possible through detailed hydrodynamic modeling and through coordination and consultation with community members and local experts - none of which unfortunately USACE-JAX has done - as evidenced in my previous letter detailing the inadequacy of USCE-JAX's metocean studies and the resulting gross underestimation of FWOP damages.</p> <p>I look forward to collaborating with USACE-JAX on formulating a hybrid approach that will be acceptable to the community of Rincon</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Dr. Canals, thank you for your comment and suggestion. We evaluated many comments received during the public review period, including yours, and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component. We look forward to hearing your input on this revised TSP.</p>
174	Luis Ayala Jan 6, 2021	<p>We request an extension as there has been little communication about it. We support the senator request in this issue.</p>	<p>PRIMARY CONCERN: Requesting review time extension</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan.</p>


Number	Commenter	Comment	Corps Response
175	Carmen Brown Jan 6, 2021	I opposed the beach-revetment project and I am in favor of beach replenishment in my town of Rincon, Puerto Rico.	PRIMARY CONCERN: TSP in Rincon Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
176	Ian Shavitz Jan 6, 2021	Attached please find the comments of Concilio de Preservación Constera, Inc. and the Román-Más Foundation Corp. to the <i>Puerto Rico Coastal Study, Draft Integrated Feasibility Report and Environmental Assessment</i> prepared by the U.S. Army Corps of Engineers Jacksonville District. PDF with formal comments: “USACE Feasibility Study Comments (1-6-21)”	PRIMARY CONCERN: Revetments at the headlands Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses, to reformulate the proposed plan with updated information about existing conditions. A rock revetment is no longer being proposed on Punta Las Marias. Erosion was assessed but was found to have seasonal shifts in sand, and damages to structures from erosion was found to be at lower risk than damages from coastal flooding. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the communities existing recreational beach features. We look forward to your comments during the public comment period as well as discussions at the public meetings we will hold in Puerto Rico.


Number	Commenter	Comment	Corps Response
		<div><div><div><div><div><div></div><div>ATTORNEYS AT LAW</div></div></div><div><div><div></div><div>Lippes Mathias</div></div><div><div>Wexler Friedman LLP</div></div></div></div></div><div><div>1900 K Street, NW Suite 730 Washington, DC 20006 Phone: 202.888.7610 lippes.com</div></div></div> <div>January 6, 2021</div> <div><div>U.S. Army Corps of Engineers ATTN: Angela Dunn 701 San Marco Blvd. Jacksonville, Florida 32207-8175 Via email: PuertoRicoCoastalStudy@usace.army.mil</div><div><i>Re: Comments of Concilio de Preservación Constera, Inc. and the Román-Más Foundation on the Puerto Rico Coastal Study Draft Integrated Feasibility Report And Environmental Assessment</i></div><div>Dear Ms. Dunn,</div><div>Lippes Mathias Wexler Friedman LLP hereby files the comments below on behalf of its clients Concilio de Preservación Constera, Inc. (CPC) and the Román-Más Foundation Corp. (RMF) (Commenters) to the Puerto Rico Coastal Study, Draft Integrated Feasibility Report and Environmental Assessment (Study), dated November 2020, prepared by the U.S. Army Corps of Engineers (USACE), Jacksonville District.</div><div><u>INTERESTS AND POSITION OF THE COMMENTERS</u></div><div><p>Concilio de Preservación Constera, Inc. (CPC) is a not-for-profit organization comprised of residents of Punta Las Marias that access and use the pocket beach located west of Ocean Park (proximate to Calle Almendro) for recreation and as an entry point from public roadways to access the beaches that extend west to Punta Piedrita. The Román-Más Foundation Corp. (RMF) is a not-for-profit organization that focuses on environmental research as well as the conservation and sustainable use of Puerto Rico’s natural resources for educational and recreational purposes.</p><p>The Commenters represent and are among the numerous local residents and interested parties that rely upon the coastal areas that are the subject of the Study for economic, recreational, aesthetic, and other values. Commenters and their members frequently use the coastal areas for beach recreation and watersports, including sunbathing, swimming, surfing, paddle boarding, and kite surfing, among others. Further, in the Punta Las Marias sector, Commenters and their members routinely use public beach access at Calle Almendro to access the ocean and the beaches in the Ocean Park area between Punta Las Marias and Punta Piedrita.</p><p>As detailed below, Commenters concerns focus primarily on the Study’s proposal (embodied in the Tentatively Selected Plan (TSP)) to place revetment on sandy beaches located directly adjacent to the Ocean Park Pocket Beach. The TSP proposes revetment for these sandy beaches because the Study mischaracterizes these areas part of headlands, where placement of revetment is the only solution that the Study considers. Unlike the portions of the headland areas where the shoreline consists of rocky areas, revetment, or sea walls, the mischaracterized sandy beach areas are used by</p></div><div><div>Ian Shavitz Partner ishavitz@lippes.com New York: Albany, Buffalo, New York City • Florida: Jacksonville • Ontario: Greater Toronto Area • Washington, D.C.</div></div></div>	



Number	Commenter	Comment	Corps Response
		<div></div> <p>the public for recreation and access to the Ocean Park Pocket Beach, and thus revetment is not an appropriate solution. Even more, placing revetment at these sandy beach areas is not consistent with Puerto Rico’s laws, regulations and policies that protect access to and use of Puerto Rico’s shorelines, as demonstrated by the fact that the Puerto Rico Planning Board, the Puerto Rico Department of Natural and Environmental Resources (DNER), the project’s non-Federal Sponsor), and the USACE itself rejected a recent application by a private party to place revetment over one of the very same sandy beaches that the Study now proposes to eliminate with revetment.</p> <p>As addressed below, there are alternative solutions that will satisfy the Study’s purpose of protecting the shoreline and protecting these sandy beach areas, making such alternatives reasonable, practicable, and in the public interest. Accordingly, the National Environmental Policy Act (NEPA) requires the USACE to identify and evaluate such alternatives, and the Clean Water Act (CWA) (with which compliance will be required to implement the proposed solutions) requires the USACE to select such an alternative.</p> <p>I. Improper Classification of Beaches at Punta Piedrita and Punta Las Marías as Headlands</p> <p>The Study divides the northern coastal areas into pocket beaches and headlands. With respect to the pocket beaches, the Study recognizes the importance of preserving recreational opportunities. Accordingly, the TSP seeks to protect, preserve, and enhance the pocket beaches by combining beach nourishment and breakwaters. The Study (at 3-33) also acknowledges the potential negative impacts of implementation of rock revetments in sandy beaches, including safety concerns for swimmers and surfers due to waves and water interacting with the revetment; unpleasing aesthetics; and loss of public recreation area and beach culture. The Study states that the headlands contain “little to no dry beach” and as such, the TSP includes a revetment solution for the headland areas. The result is that the sandy beaches directly adjacent to pocket beaches, and that serve the same purposes a pocket beaches, will be destroyed while the adjacent pocket beaches are protected and enhanced. This is an arbitrary outcome that the USACE must rectify.</p> <p>In preparing the Study, the USACE divided planning reaches based on headland and pocket beach features without explaining why sandy beaches directly adjacent to the Ocean Park Pocket Beach were lumped into the Punta Las Marías and Punta Piedrita headlands,¹ where those sandy beach areas were grouped with armored revetment and/or seawall. Commenters primary concern with the Study is that the headlands immediately adjacent to the east and west of the Ocean Park Pocket Beach (i.e., Punta Piedrita and Punta Las Marías, respectively) include sandy beaches that are used by residents for both recreation and to access the Ocean Park Pocket Beach. Commentators urge the USACE to adjust the TSP in the Ocean Park sector by extending the eastern and western boundaries of the planning reach outward to include, protect, and enhance the adjacent sandy beaches that are now classified (improperly) as part of the headlands and therefore would be completely eliminated by the proposed revetment.</p> <div><hr/>¹ See Study at § 3.7.1.</div>	


Number	Commenter	Comment	Corps Response
		<div data-bbox="752 318 839 405"></div> <p data-bbox="739 469 1681 657">At Punta Las Marías, the TSP proposes an approximately 1,400-foot-long revetment from approximately one parcel west of Calle Almendro to one parcel east of the headland. The proposed revetment appears to cover approximately 325 feet of beach (from one parcel to the east of Calle Almendro to one parcel to the west) and approximately 100 feet of beach west of Calle Doncella, with the remaining approximately 1,000 feet appearing to already be armored by existing revetment or seawalls that proved to be very effective in protecting the properties along the coast during Hurricane María; little to no impact was reported to such properties.²</p> <div data-bbox="767 679 1647 1070"></div> <p data-bbox="739 1094 1681 1366">It is clear from the above picture of the Punta Las Marías headland that Ocean Park’s sandy beach extends into the area that the Study identifies as headlands, and continues approximately 325 feet further east (to one property west of Calle Almendro). The revetment on the western side of the headland, as proposed in the TSP, will eliminate both this beach area as well as the existing access point via Calle Almendro that residents and the public use for recreation and access to the Ocean Park Pocket Beach. To protect these beaches and the public access, and treat these beaches similarly to the remainder of the Ocean Park Pocket Beach, the western portion of the revetment should begin further east (by approximately 325 feet), as shown below, and the TSP breakwater solution protecting the Ocean Park Pocket Beach and beach nourishment activities could similarly be extended east to protect these existing sandy beaches.</p> <div data-bbox="739 1649 1324 1679"><p>² These distances were estimated utilizing publicly available online maps.</p></div>	


Number	Commenter	Comment	Corps Response
		<div data-bbox="755 318 842 405"></div> <div data-bbox="761 463 1656 860"></div> <p data-bbox="739 883 1681 1074">A similar situation exists at Punta Piedrita, as shown in the image below. Commenters estimate that approximately 1,150 feet on the eastern side of the planning reach and approximately 800 feet on the western edge of the planning reach are similarly sandy beach areas (<i>i.e.</i>, extensions of the adjacent pocket beaches). Just as in Punta Las Marias, these sandy beach areas are heavily used by residents and visitors for beach access, recreation, and economic activity. Therefore, the USACE should similarly consider non-revetment action alternatives that would protect and enhance these sandy beach areas.</p> <div data-bbox="739 1096 1678 1649"></div>	


Number	Commenter	Comment	Corps Response
		<div></div> <p>Proper and accurate boundaries and classifications of pocket beaches and headlands is critical, as the Study serves as the USACE’s Environmental Assessment under NEPA and therefore must be factually accurate to allow for proper identification of impacts and reasoned agency decision-making, a fundamental purpose of NEPA and its environmental analysis process. While NEPA is a procedural statute that does not require a particular substantive outcome, NEPA requires “agencies to take a ‘hard look’ at how the choices before them affect the environment”³ Thus, it is critical that a study prepared under NEPA is accurate and contains complete and well-supported data and information to allow the decision-maker to fulfill its “hard look” obligation. Additionally, proper and accurate information is the foundation of the reasoned decision-making that the USACE must undertake when it acts, including in obtaining the required Coastal Zone Management Act consistency certification and Clean Water Act section 401 water quality certification in connection with Clean Water Act section 404 permitting.</p> <p>Improperly classifying the sandy beach portions of Punta Las Marías and Punta Piedrita as headlands is significant, because the Study (in a one-size-fits-all fashion) assumes that headlands do not include recreational beaches, and thus the placement of revetment in headlands that would in fact eliminate such beaches and beach access, is not recognized, analyzed, or considered in the Study.⁴ The USACE must correct this oversight.</p> <p>II. Improperly Classifying the Punta Las Marías and Punta Piedrita Sandy Beach Areas as Headlands Improperly Limits Consideration of Alternatives for these Areas</p> <p>NEPA also requires that the USACE identify, rigorously explore, and objectively evaluate a “range of reasonable alternatives” when undertaking federal actions.⁵ Including the Punta Las Marías and Punta Piedrita sandy beach areas immediately adjacent to the east and west of the Ocean Park Pocket Beach as headlands (rather than as parts of the Ocean Park Pocket Beach) result in the USACE only studying the no action and revetment alternatives for these areas, as these are the only alternatives that the USACE identified and evaluated for headlands. In other words, in preparing the Study, the only alternatives that the USACE considered were to do nothing or eliminate the beaches completely with a rock revetment. This binary choice, in a Study that recognizes the need to protect beaches and recreation opportunities, does not represent the required “range of reasonable alternatives” that NEPA requires the USACE to evaluate.</p> <p>Instead, the Study improperly describes and mischaracterizes the Punta Las Marías and Punta Piedrita planning reaches, describing them as containing little to no dry beach and exposed bedrock and nearshore hardbottoms. In fact, there are numerous sandy beach areas, as described above, and</p> <div><p>³ W. Watersheds Project v. Abbey, 719 F.3d 1035, 1047 (9th Cir. 2013) (internal quotation and citation omitted).</p><p>⁴ Commenters note that the USACE may wish to analyze protecting the entirety of the Punta Las Marías planning reach with breakwaters and nourishment, rather than pre-determining, without analysis, that such protection would not work.</p><p>⁵ 40 C.F.R. § 1505.1(3); <i>Forty Most Asked Questions Concerning CEQ’s NEPA Regulations</i>, 46 Fed. Reg. 18,026 (Mar. 23, 1981) at Question 1a.</p></div>	


Number	Commenter	Comment	Corps Response
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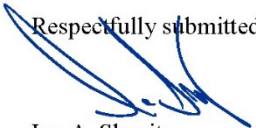
Number	Commenter	Comment	Corps Response
		<div></div> <div></div> <div>Image: Beach fronting parcels adjacent to Calle Almendro</div> <p>In short, the proposed revetment would destroy these beaches and the public access that is protected by law.</p> <p><i>b. A revetment has already been rejected at Punta Las Marias by federal and Commonwealth permitting authorities.</i></p> <p>While Commenters’ comments apply equally to both Punta Piedrita and Punta Las Marias, CPC’s membership consists primarily of residents of Punta Las Marias that utilize the Punta Las Marias beach for recreation and access to the Ocean Park Beach. Furthermore CPC’s membership, with the technical assistance from RMF, has a long history of protecting Punta Las Marias’ remaining beaches against individual property owners who have sought the use of rock revetment to correct the problems associated with poorly designed and constructed seawalls. Notwithstanding the Study’s statement (on page 3-38) that a revetment at this location is “consistent with Federal and local regulations,” the Puerto Rico Planning Board, DNER, and the USACE have expressly rejected efforts to build a revetment – substantially similar to the TSP revetment proposed for this area – over the sandy beach fronting the parcel immediately east of Calle Almendro (to the left of Calle Almendro in the above image).</p> <p>i. <u>DNER Regulation 4860 Permit</u></p> <p>DNER rejected the proposal for a revetment in this area as inconsistent with Regulation 4860’s purposes on July 24, 2019.</p>	


Number	Commenter	Comment	Corps Response
		<div></div> <p>Puerto Rico Regulation 4860 governs the administration of the maritime-terrestrial zone, which includes the area in which a private party had proposed (and the USACE is now proposing) to place revetment. On April 16, 2019, an application was submitted to DNER and the Planning Board for a permit to authorize the placement of revetment. In a reply letter dated July 24, 2019, DNER rejected the proposal as submitted, finding that installing a revetment was inconsistent with Regulation 4860’s purposes of guaranteeing public use of the sea and its shores</p> <p>ii. <u>Planning Board CZMA Consistency Certification</u></p> <p>The Puerto Rico Planning Board (Planning Board) denied the application for a Federal Coastal Consistency Certificate for a revetment at this location under the CZMA on February 21, 2020.</p> <p>Section 307 of the Coastal Zone Management Act (CZMA)⁶ requires that federal actions that affect land or water use in the coastal zone be consistent with approved state (or, here, territorial) coastal zone management programs to the maximum extent practicable. Puerto Rico administers the Puerto Rico Coastal Zone Management Program (PRCZMP)⁷ through two agencies: DNER and the Planning Board. DNER is the lead agency for the PRCZMP, while the Planning Board is responsible for issuing consistency certifications.⁸ DNER carries out its responsibilities for implementing the PRCZMP in part through Regulation 4860 – the regulation under which DNER refused to grant the application..</p> <p>A revetment is not consistent with the PRCZMP and its incorporated laws and policies, which are clear as to the need to preserve and protect beach access, stating that development should be “designed to facilitate instead of obstruct access to the coast by the general public;” that the citizenry has a right to “free access and enjoyment of the beaches of Puerto Rico;” that “all visitors and residents of Puerto Rico have equal opportunity . . . by right and in reality . . . to enjoy the coasts and specially the beaches of Puerto Rico;” and that all projects contiguous to the maritime coast line “will be required to provide one or more public access ways through or bordering the project” to the beach.</p> <p>In its denial, the Planning Board found that a revetment at this location would be within Public Domain Lands and would not be able to be permitted as proposed.</p> <p>iii. <u>USACE Clean Water Act Section 404</u></p> <p>The USACE denied without prejudice the Clean Water Act Section 404 permit application for the proposed revetment⁹ due to the denial of a required territorial authorization and/or certification. Thus, the USACE itself has already determined that at least the portion of the revetment at Punta</p> <div><p>⁶ 16 U.S.C. § 1456.</p><p>⁷ Available at http://dma.pr.gov/historico/oficinas/am/recursosviviendes/costasreservasrefugios/pmzc/pmzc2009/PMZCPR%20ingles%202009%20final.pdf.</p><p>⁸ PRCZMP, <i>supra</i> n. 2, at 3.</p><p>⁹ Application number CZ-2019-0312-091.</p></div>	

Number	Commenter	Comment	Corps Response
		<div></div> <p>Las Marias that it proposes cannot be permitted because it will destroy public access to the beach in violation of local laws and policies.¹⁰</p> <p>IV. USACE Cannot Properly Issue a CWA Permit for the Proposed Revetment at Punta Las Marias and Punta Piedrita</p> <p>The Study is an early step in the planning process. If the USACE proceeds with implementing the TSP, authorization will be required under Clean Water Act § 404 to discharge dredge or fill material in the ocean. CWA § 404 requires that the USACE only authorize or issue a permit for the alternative that constitutes the Least Environmentally Damaging Practicable Alternative (LEDPA) and determine whether this alternative is in the public interest. In the westernmost portion of Punta Las Marias and the easternmost portion of Punta Piedrita, given the alternative solution of extending the revetment and the breakwaters/beach nourishment activities to protect the sandy beach and beach access, placing revetment that will eliminate the beach and beach access cannot be the LEDPA and is not in the public interest.</p> <p><i>a. Placing a revetment at the proposed location is not the LEDPA</i></p> <p>The USACE is responsible for issuing Section 404 permits in accordance with EPA’s Section 404(b)(1) Guidelines,¹¹ which state, in relevant part: “[N]o discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences.”¹² Similarly, 40 C.F.R. §230.10 prohibits the USACE from issuing a permit where “there is a practicable alternative to the proposed discharged which would have less adverse impact on the aquatic ecosystem.”¹³ “An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.”¹⁴</p> <p>As noted, the USACE can accomplish its primary objective (of reducing damages to properties and infrastructure) and its secondary objectives (of maintaining existing recreation and aesthetic qualities for affected communities) with a non-revetment solution, such as in the case of Punta Las Marias, by extending the breakwater approximately 350 feet to the east to provide protection for these beaches while allowing for continued beach use and access (which could be enhanced through beach nourishment).</p> <div><p>¹⁰ Again, Commenters note that many of the same arguments regarding the appropriateness of revetment for sandy beach areas in Punta Las Marias apply in Punta Piedrita. Punta Piedrita similarly contains sandy beach areas, including notably at the western and eastern ends of the planning reach. The USACE should analyze alternative solutions, including extending the proposed breakwaters and nourishment, that would preserve existing the sandy beaches and heavily used access points.</p><p>¹¹ See 33 C.F.R. § 320.4(a)(1) (“For activities involving 404 discharges, a permit will be denied if the discharge that would be authorized by such permit would not comply with the [EPA’s] 404(b)(1) guidelines.”).</p><p>¹² 40 C.F.R. § 230.10(a).</p><p>¹³ <i>Id.</i></p><p>¹⁴ <i>Id.</i> at (2).</p></div>	

Number	Commenter	Comment	Corps Response
		<div></div> <p><i>b. Placing a revetment at the proposed locations is contrary to the Public Interest</i></p> <p>The Corps must evaluate the probable impacts of the proposed activity and its intended use on the “public interest.”¹⁵ This “public interest evaluation” requires a “careful weighing” of all of the factors, with the reasonably anticipated benefits of the proposal balanced against its reasonably foreseeable detriments.¹⁶ Relevant public interest factors here include aesthetics, general environmental concerns, land use, recreation, and, in general, the needs and welfare of the people.¹⁷</p> <p>The public’s continued use of and access to beaches is a paramount public interest factor. Puerto Rico has a strong policy favoring public access to beaches. Since at least 1978, the PRCZMP has pursued the following policy:</p> <p>“Public access to beaches. Development in front of the coast, be they public or private, should, in the measure in which it is practical, be designed to facilitate instead of obstructing access to the coast by the general public. It is recognized that the general wellbeing, on occasions, requires restriction of access (i.e. to areas of environmental crisis or endangered species or for public safety reasons). However, the de facto segregation of public beaches, as a result of development patterns, for the enjoyment of private landowners by preventing access by the general public is prohibited in Puerto Rico.”¹⁸</p> <p>Revetments in sandy beach areas will “obstruct access to the coast by the general public.”¹⁹ Moreover, given that there are ways to accomplish the Study’s primary and secondary purposes without eliminating the sandy beaches, this is not a circumstance where “restriction of access” is needed or justified.²⁰</p> <p>The criteria that the USACE must consider in conducting its Public Interest analysis also would weigh strongly against the USACE issuing a permit for a revetment. The USACE must consider “the practicability of using reasonable alternative . . . methods to accomplish the objective of the proposed structure or work,” where there are “unresolved conflicts as to resource use.” Here, there is a direct conflict between the public’s continued use of the sandy beaches, which is in the public interest, and eliminating these beaches with revetments. And as noted above, there are alternative</p> <div><p>¹⁵ See 33 C.F.R. § 320.4(a)(1).</p><p>¹⁶ <i>Id.</i></p><p>¹⁷ <i>Id.</i>; see <i>Ecological Rights Found. v. Pac. Lumber Co.</i>, 230 F.3d 1141, 1149 (9th Cir. 2000) (recognizing injury to aesthetic and recreational interests for purposes of standing in Clean Water Act litigation); <i>Friends of the Earth v. Consol. Rail Corp.</i>, 768 F.2d 57, 61 (2d Cir. 1985) (recognizing standing of individuals who alleged that pollution in the river was “offensive to [his] aesthetic values”).</p><p>¹⁸ PRCZMP, <i>supra</i>; see also U.S. Department of Commerce: NOAA, Department of Natural Resources & Puerto Rico Planning Board. (1978). Puerto Rico Coastal Management Program and Final Environmental Impact Statement (<i>Programa de Manejo de la Zona Costanera de Puerto Rico</i>).</p><p>¹⁹ <i>Id.</i></p><p>²⁰ <i>Id.</i></p></div>	



Number	Commenter	Comment	Corps Response
		<div></div> <p>methods to protect these beach areas that meet the Study’s purposes without eliminating access to and use of the beaches.</p> <p>The USACE must also consider “the extent and permanence of the beneficial and/or detrimental effects which the proposed structure or work is likely to have on the public and private uses to which the area is suited.” Here, Puerto Rico law entitles the public to use – and the public does use – the beaches for recreation, which is the exact use for which these beaches are suited. A revetment will have a permanent and detrimental effect on the public’s use of the beaches.</p> <p>The need to preserve the public’s ability to recreate in an area designated for public use – a public interest factor that the USACE must consider – also weighs against a revetment wall at the proposed locations. Section 320.4(e) provides:</p> <p>“Applications for [Department of Army] permits may involve areas which possess . . . recreational or similar values. . . . Recognition of those values is often reflected by state, regional, or local land use classifications, or by similar federal controls or policies. Action on permit applications should, insofar as possible, be consistent with, and avoid significant adverse effects on the values or purposes for which those classifications, controls, or policies were established.”²¹</p> <p>Puerto Rico’s laws, regulations and custom provide for and seek to ensure that public beach access is not limited. Giving deference pursuant to 33 C.F.R. § 320.4(e), the USACE may only approve an alternative that “avoid[s] significant adverse effects on the values or purposes for which those classifications, controls, or policies were established.”²²</p> <p>V. Preserving All Recreational Uses at the Ocean Park Pocket Beach</p> <p>As noted above, the Study areas are heavily used for recreation purposes, and a secondary objective of the Study is to maintain recreational use of beaches and nearshore areas.²³ While the Rincon area is better known for wave-dependent watersports such as surfing, ocean paddle boarding, and kite surfing, these watersports also occur at the Ocean Park Pocket Beach.</p> <p>The Study (at 3-33) acknowledges the potential negative impacts of implementation of rock revetments in sandy beaches, including safety concerns for swimmers and surfers due to waves and water interacting with the revetment; unpleasing aesthetics; and loss of public recreation area and beach culture. While Commenters recognize that breakwaters are a better option to protect pocket beaches than revetment, depending on size and placement of the breakwaters, potential negative impacts could remain, including primarily loss of wave action required for surfing, paddle boarding, and kite surfing. If the USACE selects breakwaters as the solution for the Ocean Park Pocket Beaches, as the design and permitting advance, the USACE should undertake wave action modeling to determine the placement of breakwaters that will serve the protection purpose while maximizing</p> <div><p>²¹ 33 C.F.R. § 320.4(e).</p><p>²² 33 C.F.R. § 320.4(e)</p><p>²³ In addition to protecting the environment.</p></div>	

Number	Commenter	Comment	Corps Response
		<div></div> <p>the continued opportunities for wave-dependent recreation, and the businesses such as surfing schools, that rely on these recreational opportunities.</p> <p>VI. The USACE Should Provide Additional Time for Public Input</p> <p>Commenters believe that additional time for public comment is warranted. The Study, with Appendices, runs in the hundreds of pages. For the USACE to offer only a cursory 45 days for public comment, during a global pandemic, covering major holidays including Thanksgiving and Christmas, frustrates the ability of the affected public to comment. This is particularly striking when the January 6th deadline for comments is the traditional Puerto Rican holiday of Three Kings' Day (also known as Epiphany). Commenters therefore urge the USACE to hold an additional comment period or accept additional public input prior to finalizing the Study and making a NEPA finding</p> <p>VII. Conclusion</p> <p>For the foregoing reasons, Commenters urge that the USACE remedy the classification of the sandy beach areas at Punta Las Marias and Punta Piedrita by including them in the planning reach for the Ocean Park Pocket Beach, with which they share the common defining characteristics of sandy beach. This will allow the USACE to protect these beach areas with breakwaters and nourishment, while avoiding the need to destroy a portion of the public domain and eliminate a valuable and highly used beaches and public access points.</p> <p>Because this proposed reclassification involves small stretches of beach areas and would rely on measures already identified in the TSP as appropriate for contiguous areas, it is likely that the USACE could make such an adjustment with minimal delay. In fact, the USACE's letter seeking a CZMA consistency certification (included in Study Appendix G) states that, while there is a current preferred alternative, "a final preferred plan may propose revetment, nourishment or breakwaters, or a combination of these features." This clearly leaves open the option of adjusting which protection features will protect which reaches.</p> <p>Respectfully submitted,</p> <div></div> <p>Ian A. Shavitz Lippes Mathias Wexler Friedman LLP Counsel for Concilio de Preservación Constera, Inc., and the Román-Más Foundation Corp.</p>	

Number	Commenter	Comment	Corps Response
177	Edward McGrath Jan 6, 2021	<p>We are residents of the Punta Las Marias neighborhood of San Juan, PR. My wife and I own the residence located on Calle Forte #22 which is very close to the coast. We recently read the article in El Nuevo Dia titled "Preocupa El Plan Para Atender la Erosión Costera" published on January 3, 2021 which talks about proposed recommendations to protect Puerto Rico's coasts, specifically San Juan and Rincon.</p> <p>We respectfully would like you to include the Punta Las Marias coast (in San Juan) in your evaluation of the Puerto Rico coastal erosion study. Please note that Punta Las Marias had a beautiful beach that used to go around the entire point connecting Park Boulevard / Ocean Park to Isla Verde, until approximately 20 years ago. Over the last 20 years the sand has almost entirely disappeared in this area triggered by various events and factors. The Boca de Cangrejos dredging that was completed many years ago disrupted the currents of the ocean waters in front of Isla Verde beach, Punta Las Marias, and other areas which in turn caused erosion to the coastline. Consequently, over the last 20 years rocks have been added to Punta Las Marias coastline, which caused further erosion and eliminated the beach in most areas.</p> <p>Attached please see the picture that shows a wave breaking over the rocks and wall erected along the Punta Las Marias coastline (facing east along Calle Forte road). This occurs often throughout the year. We understand that you are considering several solutions - including planting more coastal trees, palms and the like to hold up the sand of the coast. We believe this is a great idea and very much hope you consider it as a solution for Punta Las Marias.</p> <p>Please we request the Corps of Engineers conduct a thorough evaluation regarding how to best salvage this coastline before more of the coast is further eroded and swallowed by the ocean waters.</p> 	<p>PRIMARY CONCERN: Revetments at the headlands</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses, to reformulate the proposed plan with updated information about existing conditions.</p> <p>A rock revetment is no longer being proposed on Punta Las Marias. Erosion was assessed but was found to have seasonal shifts in sand, and damages to structures from erosion was found to be at lower risk than damages from coastal flooding. The tentative plan in Ocean Park will reduce the risk of coastal flooding from the ocean and will integrate into the community's existing recreational beach features.</p> <p>We look forward to your comments during the public comment period, as well as discussions at the public meetings we will hold in Puerto Rico.</p>
178	Adrian Muniz Jan 6, 2021	<p>My comments relate to your study recommendation as it pertains to the beach areas within your study specific to the municipality of Rincon, Puerto Rico. According to your own study (see Appendix C), you indicate that the percentage of the population living in poverty is 41% for the municipality of Rincon. In addition, your report states that the average income in Rincon is less than one-third that of the entire United States' average income. The tourism industry represents a large economic benefit to the island as a whole and to the municipality of Rincon. In your study, you are recommending stone revetments for the municipality of Rincon. The beaches in Rincon consist mostly of sandy beaches. These sandy areas provide for free entertainment activities and relaxation to the residents of Rincon. In addition, visitors from all around the island of Puerto Rico as well as from other parts of the world come to Rincon to enjoy its sandy beaches resulting in economic and social benefits to the municipality and its residents. Your</p>	<p>PRIMARY CONCERN: TSP in Rincon</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon</p>


Draft Report (from November 2020) Puerto Rico Coastal Study Comment Response Matrix

Number	Commenter	Comment	Corps Response
		recommendation for stone revetments, if implemented, will result in turning the shorelines of the municipality of Rincon identified in your report into rocky beaches. This would negatively affect the aforementioned current social and economic benefits of Rincon's sandy beaches. The effect would be felt most by those identified in your report as living in poverty. Therefore, I am requesting that you consider other alternatives (including options already discussed in your report) that would not negatively affect the sandy beaches in the Rincon municipality. For example, beach nourishment and breakwaters could be used in order to preserve and/or improve the social and economic benefits derived from the sandy beaches as described above.	will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
179	Teddy Rosario Jan 6, 2021	30 days more. Please help our coasts and beaches in Rincon and San Juan, PR.	PRIMARY CONCERN: Requesting review time extension Thank you for your comment. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.
180	Jose Diaz Marrero- Jenniffer Gonzalez (Congresswoman) Jan 6, 2021	<p>Good afternoon, and all the best in the New Year.</p> <p>Congresswoman Jenniffer Gonzalez-Colon (PR) submits the attached letter in support of Puerto Rico DNER Secretary Machargo’s comment on the Puerto Rico Coastal study and his request for an extension of the comment period (also attached).</p> <p>As always, we greatly appreciate the attention and commitment shown to Puerto Rico and communities across the nation through trying times.</p>	PRIMARY CONCERN: Requesting review time extension Thank you for your comment and for your support during the study process. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional environmental and technical analyses to reformulate the proposed plan. There is a new 30-day review public period for this re-release of the draft report. We look forward to your comments, as well as discussions at the public meetings we will hold in Puerto Rico.

Number	Commenter	Comment	Corps Response
		<div><div><p>JENNIFFER GONZÁLEZ-COLÓN PUERTO RICO, AT LARGE</p><hr/><p>WASHINGTON OFFICE: 1809 LONGWORTH HOUSE OFFICE BUILDING (202) 225-6215 FAX: (202) 225-2154</p><hr/><p>SAN JUAN OFFICE: 157 AVENIDA DE LA CONSTITUCIÓN ANTIGUO EDIFICIO DE MEDICINA TROPICAL SEGUNDO PISO SAN JUAN, PUERTO RICO 00901 (787) 723-6333 FAX: (787) 729-7738</p></div><div><p>Congress of the United States House of Representatives Washington, DC 20515-5400</p></div><div><p>COMMITTEES: TRANSPORTATION & INFRASTRUCTURE</p><p>SUBCOMMITTEES ECONOMIC DEVELOPMENT, PUBLIC BUILDINGS AND EMERGENCY MANAGEMENT WATER RESOURCES AND ENVIRONMENT</p><p>NATURAL RESOURCES</p><p>SUBCOMMITTEES WATER, OCEANS AND WILDLIFE OVERSIGHT AND INVESTIGATIONS</p></div></div> <p>January 6, 2021</p> <p>COL Andrew D. Kelly Commander and District Engineer USACE Jacksonville District 701 San Marco Blvd Jacksonville FL 32207</p> <p>Dear Colonel Kelly:</p> <p>I write in support of the request from Secretary Rafael Machargo of the Puerto Rico Department of Natural and Environmental Resources (DNER) for an extension if the comment period for the Puerto Rico Coastal Erosion Study, carried out by the U.S. Army Corps of Engineers (USACE) under the provisions of the Bipartisan Budget Act of 2018 (BBA).</p> <p>The realities of the government of Puerto Rico being in an administration transition process plus varying pandemic response orders, that in turn also affect nongovernmental stakeholders has meant that the period originally provided, from December 10, 2020 to January 6, 2021, has been insufficient for all the individuals and organizations that contribute to DNER's response to provide their input. Many of those stakeholders have appealed to the Secretary of DNER for more time for the needed commentary. The Secretary, in his comments to USACE (attached) has made a request for an extension of thirty (30) days to the commentary period.</p> <p>The Puerto Rico Coastal Study is an important part of the large set of projects under BBA that will address coastal erosion, flooding, navigation and other critical public safety and economic infrastructure needs. For its success it is extremely important that the community knows the agencies have listened to their concerns.</p> <p>This is why I support Secretary Machargo's request to extend the commentary period for an additional 30 days, and urge that it be given prompt attention and all due consideration as allowed by the applicable the laws, regulations and policies.</p> <p>Cordially,</p> <div></div> <p>Jenniffer González-Colón Member of Congress</p> <p>Attached- DNER Comments 1-6-2021 Cc: Hon. Rafael Machargo, Secretary, Puerto Rico Department of Natural and Environmental Resources</p>	


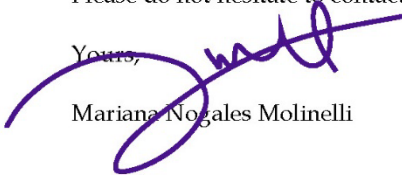

181	Robin Walker Jan 6, 2021	Scanned, handwritten letter: Past irresponsible coastal development. Priority should be placed on poor, vulnerable communities that are difficult to move and protect from coastal erosion.	PRIMARY CONCERN: TSP Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.
COMMENTS RECEIVED AFTER REVIEW PERIOD ENDED			
182	Diana Diaz Jan 12, 2021	<p>I solicit the Corps to consider the following alternatives in the Puerto Rico CSRM Feasibility Study, which has the following objective: to manage the risk of damage from wave attack, flooding, and erosion caused by costal storm. It also has the goal of maintaining recreation and environmental quality. Accordingly, the alternative selected must meet the main objective and satisfy a balance between costs and benefits. The no-action alternative does not meet the main objective or the secondary objectives (purpose and need). The alternatives 2 through 4 (revetment, beach nourishment, breakwaters, beach nourishment + breakwaters) are alternatives that meet the main objective but certainly do not maintain environmental quality no maintain recreation. The Corps must consider alternatives that meet all objectives. Otherwise, the hard look standard under the National Environmental Policy has not been met. Revetment and breakwater will significantly impact recreation in these areas in Condado, Ocean Park, Punta Las Marias, and Rincon, by significantly impacting the ecology in these regions. Beach nourishment might come at a higher cost but would not impact ecology or recreation. Other alternatives that the Corps must consider, which do meet the main objectives and maintain the recreation and environmental quality are artificial reefs and stabilization via planting native beach plants. A combination of artificial reefs and stabilization via re-vegetation with native beach plants must also be considered. Beach nourishment can also play a role in this last combination. The Corps study must identify the beach plants that would work for each of the areas considered.</p> <p>The Corps must also conduct its consultation under the Section 7 of the Endangered Species Act, which would include a biological opinion, as in these areas there are the leatherback sea turtles that come to nest in these coasts. Except for beach nourishment, the other alternatives considered by the Corps would significantly impact these leatherback sea turtles since the Corps will be significantly altering the areas where they nest.</p> <p>Given that reasonable alternatives such as artificial reefs and stabilization via vegetation have not been considered in the environmental assessment and are required to be considered in order to satisfy the hard look under NEPA. Similarly, the impacts to endangered species have not been adequately studied and discussed in the EA, which, again, identifies a significant deficiency</p>	PRIMARY CONCERN: Environmental Impacts Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component. A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.

		<p>in meeting the hard look under NEPA. Additionally, a biological opinion consistent with Section 7 of the ESA and required consultation with Fish and Wildlife and the National Fisheries must be developed and carried out, respectively. Given that reasonable alternatives have not been considered and significant impacts to endangered species are anticipated, the Corp cannot conclude with a finding of no significant impact and therefore must prepare an environmental impact statement.</p> <p>Finally, additional time must be given to provide comments on this important matter. The Corps must re-open the public comment period. It is not difficult to re-open the comment period and would substantially benefit the communities that live along these coasts. That benefit outweighs any drawbacks the Corps could identify from re-opening the comment period.</p> <p>Thank you for the opportunity to provide comments and I hope that serious consideration is given to the alternatives I have identified in these comments.</p>	
183	Pam Trumbull Jan 18, 2021	<p>I realize the public comment period regarding the proposals for saving coastal infrastructure in Rincon, PR has passed. Nevertheless, I hope that as local property owner who has just been made aware of these potential projects, I will be allowed to have my opinion considered.</p> <p>I realize that the primary goal is preservation of coastal infrastructure, but I believe that the overall long term economic impact of each proposal holds equal importance.</p> <p>Installing rocks in the proposed area of Rincon may protect infrastructure but comes with long term deleterious economic impact. Of course, property values will suffer. But you must also consider the effect on tourism to the entire town, and I would argue, surrounding towns. Rincon is famous for its surfing, but the area of the proposed intervention has always been host to the best swimming beaches, even better than the Balneario. This is the family friendly side of town. It's a quieter area of town, with little wave action and no competition to novice swimmers from potentially dangerous surf boards.</p> <p>I believe if we give up on these beaches we are giving up a large percentage of our potential tourists that we will not recover. And this particular demographic is very valuable. Families spend more money on restaurants, day trips and souvenirs than do surfers. Limiting or eliminating the swimming beaches will likely send this demographic elsewhere.</p> <p>It's also my understanding that these beaches were nesting sites for sea turtles. While I can't speak to any further environmental impacts of these plans, I can at least say that I am in favor of providing nesting sites for turtles.</p> <p>In closing, please consider more than just saving physical infrastructure in your decision. Reestablishing these beaches would be a boon to local tourism at a time when Rincon and Puerto Rico as a whole could really benefit.</p> <p>Thank you for your consideration.</p>	<p>PRIMARY CONCERN: TSP in Rincon and Environmental Impacts</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p>
184	Jenniffer Gonzalez (Congresswoman) Jan 29, 2021	<p>Letter directed to the ASA (Mr. Stewart)</p> <p>PDF with formal comments: "1.27.21 Letter to USACE on IFREA"</p>	<p>PRIMARY CONCERN: TSP in Rincon, 4 P&G accounts and Environmental Impacts</p> <p>Congresswoman Gonzalez, Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative</p>

		<div><div><div><div><div>JENNIFFER GONZÁLEZ-COLÓN</div><div>PUERTO RICO, AT LARGE</div></div><div><div>WASHINGTON OFFICE:</div><div>1609 LONGWORTH HOUSE OFFICE BUILDING</div><div>(202) 225-6215</div><div>FAX: (202) 225-2154</div></div><div><div>SAN JUAN OFFICE:</div><div>157 AVENIDA DE LA CONSTITUCIÓN</div><div>ANTIGUO EDIFICIO DE MEDICINA TROPICAL</div><div>SEGUNDO PISO</div><div>SAN JUAN, PUERTO RICO 00901</div><div>(787) 723-6333</div><div>FAX: (787) 729-7738</div></div></div></div><div><div>Congress of the United States House of Representatives Washington, DC 20515-5400</div></div><div><div>COMMITTEES:</div><div>TRANSPORTATION & INFRASTRUCTURE</div><div>SUBCOMMITTEES</div><div>ECONOMIC DEVELOPMENT, PUBLIC BUILDINGS AND</div><div>EMERGENCY MANAGEMENT</div><div>WATER RESOURCES AND ENVIRONMENT</div><div>NATURAL RESOURCES</div><div>SUBCOMMITTEES</div><div>WATER, OCEANS AND WILDLIFE</div><div>OVERSIGHT AND INVESTIGATIONS</div></div></div> <div><p>January 27, 2021</p><p>Mr. Vance F. Stewart, III Senior Official Performing the Duties of Assistant Secretary of the Army (Civil Works) U.S. Army Corps of Engineers 108 Army Pentagon Washington, D.C. 20503</p><p>Dear Mr. Stewart:</p><p>As the sole representative for Puerto Rico in Congress, I write in regard to the ongoing Puerto Rico Coastal Study, which to my understanding is in the phase where a recommended plan will soon be prepared. The U.S. Army Corps of Engineers (USACE) has been instrumental in the recovery of Puerto Rico and this study, and in addition to the San Juan Metro Feasibility Study, are critical towards combating future storm damages and improving resiliency of our shorelines and our communities.</p><p>As expressed in my letter, dated January 6th, 2021, in response to the release of the Integrated Feasibility Report and Environmental Assessment (IFR/EA), I am concerned that the plan presented in the IFR/EA may not reflect the true costs to the local community and the Commonwealth of Puerto Rico to include the economic and environmental costs. In addition to the concerns outlined in my previously referenced letter, it is even more apparent that a comprehensive documentation of benefits has yet to be performed for this study. Upon further investigation and as echoed in the Public Meetings held on December 10th, 2020, the USACE is over-relying on national economic development (NED) benefits. Recognizing that not all benefits can be monetized, and some cannot be cost-effectively quantified, it is my belief and those of my constituents that there are additional benefits left to be accounted for.</p><p>It is my understanding that the NED Plan, proposed for Federal participation, represents the alternative that achieves the greatest net benefits for damage reduction, and it is also the plan that is consistent with protecting the environment. While Puerto Rico is an international tourist destination, the environmental quality of Puerto Rico’s coastlines is extremely important not only to the continued vested interest in our Nation’s economic development but is critical to a number of federally endangered species, such as the Hawksbill (E. imbricate) and the Leatherback (D. coriacea) sea turtle species documented to have nested within the study reaches in the 2016 season.</p></div>	<p>plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p>
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185	<p>Mariana Nogales Molinelli (Representative At-Large of the House of Representatives of Puerto Rico) Feb 5, 2021</p>	<p>This letter is on behalf of Mariana Nogales Molinelli, Representative At-Large of the House of Representatives of Puerto Rico. PDF with formal comments: "US Army Corp of Engineers.PDF"</p> <div><p>CÁMARA DE REPRESENTANTES DE PUERTO RICO</p></div> <p>VIA EMAIL</p> <p>February 5, 2021</p> <div><div><p>Rose Ortiz Díaz Analyst Office of Geology and Hydrogeology Puerto Rico Planning Board ortiz_r@jp.pr.gov</p></div><div><p>cc: Angela Dunn U.S. Army Corps of Engineers PuertoRicoCoastalStudy@usace.army.mil</p></div></div> <p>Dear Ms. Ortiz Díaz:</p> <p>On January 5, 2021, we sent the U.S. Army Corps of Engineers (USACE) a communication requesting the extension of the period to present public comments regarding the Puerto Rico Draft Integrated Feasibility Report and Environmental Assessment. On January 8, 2021, the USACE's Puerto Rico Coastal Team advised us to send our comments to you for consideration for inclusion with the comments from the Puerto Rico Planning Board (PRPB) on or before February 5, 2021.</p> <p>Accordingly, you will find our comments attached to this communication. We hope they can be considered along with the PRPB's submission, as public participation was very limited due to the reasons explained in the attached document.</p> <p>We also want to use this opportunity to explore the possibility of holding a meeting between PRPB representatives, interested scientists and our office to better communicate our shared concerns and our disposition to collaborate in the creation and implementation of an adequate process of public participation.</p> <p>Please do not hesitate to contact us if you have any questions.</p> <div><p>Yours,</p><p>Mariana Nogales Molinelli</p></div> <div><p>Representante Mariana Nogales Molinelli El Capitolio, Apartado 9022228, San Juan, Puerto Rico 00902-2228 Tel. (787) 721-6040 ext. 2320</p></div>	<p>PRIMARY CONCERN: TSP and public review</p> <p>Thank you for your comment and suggestions. We evaluated many comments received during the public review period and ultimately requested additional time to conduct additional analyses and reformulate the proposed plan. A revetment is no longer being proposed in Rincon. Breakwaters are not being proposed either due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. A beach nourishment plan is also not proposed due to the same concern regarding the extensive impact to the environmental resources. The tentative plan for Rincon will restore the sandy shoreline. Additionally, the proposal for Rincon has a native vegetation component.</p> <p>A revetment is no longer being proposed on Punta Piedrita and breakwaters are no longer being proposed in Condado or Ocean Park due to the extensive benthic resources offshore and the potential for direct adverse impacts to these resources and the species that rely upon them. The tentative plan in Ocean Park will prevent the inundation from the ocean. The publicly accessible beach in Barbosa Park will remain.</p> <p>The report documents have been prepared in English, however supporting summaries are in both English and Spanish.</p>
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