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

http://sero.nmfs.noaa.gov

December 15, 2014

F/SER47:JAR/pw

(Sent via Electronic Mail)

Colonel Allan M. Dodd, Commander Jacksonville District Corps of Engineers **Antilles Office** 400 Fernandez Juncos Avenue San Juan, Puerto Rico 00901-3299

Attention: Carmen G. Román,

Dear Colonel Dodd:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice SAJ-2014-01257 (SP-CGR) dated November 14, 2014. The Puerto Rico Airport Authority requests authorization from the Department of the Army to construct a 54,000-foot security fence at José A. de la Torre Airport, Municipality of Ceiba. The fence would be constructed in two phases. While phase two (23,000 feet) would be entirely within uplands, and its construction would not impact wetlands, phase 1 (31,000 feet) would require discharge of fill material on approximately 0.02 acres of wetlands and installation of two box culverts (20 feet long by 20 feet wide and 20 feet long by 24 feet long). Electrical infrastructure is proposed along the fence, and a temporary trench to would be needed to install the electric conduits and pull boxes. The trench would impact approximately 0.032 acres of wetlands, which would be restored to preexisting conditions once the project is completed. The public notice did not include a determination by the Jacksonville District on whether the fence and its installation would have an adverse impact on EFH or federally managed fisheries in the Caribbean. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson- Stevens Act).

The impact area consists of an estuarine mangrove wetland known as Los Machos, which is located northeastward of the airport, and a palustrine emergent wetland which is located southwestward of the airport boundary. The mangrove wetland is mostly composed of black mangroves (Avicennia germinans). The palustrine wetland is mainly composed of southern cattails (*Typha domingensis*) and para grass (*Urocloa mutica*).

The Caribbean Fishery Management Council (CFMC) identifies mangroves as EFH under the fishery management plans for spiny lobster and reef fish. Mangroves serve as nursery areas for fishery species. Mangroves are part of a habitat complex that includes seagrass, hardbottom, and coral, and this complex supports a diverse community of fish and invertebrates. Mangroves also provide important water quality maintenance functions (such as pollution uptake), stabilize



sediments, attenuate wave action, and produce and export detritus (decaying organic material), which is an important component of marine and estuarine food chains. Additional information about these EFH designations and how these habitats support fishery species is found in Essential Fish Habitat (EFH) Generic Amendment to the Fishery Management Plans (FMPs) of the U.S. Caribbean¹.

The public notice indicates the design of the fence and the accompanying patrol road were tailored to the site to avoid impacts to the higher quality mangrove and the proposed fill would not fragment wetlands. Given the small amount of impact proposed to mangrove wetlands, NMFS will not offer EFH conservation recommendations for the installation of the security fence, however, NMFS request the Jacksonville District consider having the applicant monitor the wetlands temporarily impacted by the trench. If these wetlands do not recover within three years, corrective action, which may include compensatory mitigation, should be required.

Thank you for the opportunity to provide these comments. Related questions or comments should be directed to the attention of Mr. José A. Rivera at NOAA HCD, c/o U.S. Army Corps of Engineers, 400 Fernandez Juncos Avenue, San Juan, Puerto Rico, 00901-3299. He may be reached by telephone at 787-729-6860 x 3038 or by e-mail at Jose.A.Rivera@noaa.gov.

Sincerely,

Par Willer

/ for

Virginia M. Fay Assistant Regional Administrator Habitat Conservation Division

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¹ Available at *caribbeanfmc.com/fmp_efh.html*.