



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 Alan Dodd, Commander
U.S. Army Corps of Engineers, Jacksonville District
Antilles Permits Section
400 Fernandez Avenue
San Juan Puerto Rico 00901-3299

Attention: Johann M. Sasso

Dear Colonel Dodd:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice SAJ-2014-02622 (SP-JMS), dated December 9, 2014. J.O. Virella and Associates requests authorization from the Department of the Army to stabilize the bank of the Rio Grande de Arecibo, Municipality of Arecibo, by excavating material from 2.91 acres of non-tidal river bottom from and discharging fill material (13,075 cubic yards) onto non-tidal river bank adjacent to the new PR-656 road. The new road would be constructed eastward of the existing road. Specifically, the project involves excavating scoured material displaced inside the river and placing geo-textile material and riprap to limit further erosion, scouring, and sloughing of the bank into the river. All excavation and fill activities would be performed from upland and the dredged material would be disposed in an upland site. A new vegetated buffer would be planted in the space between the top of the riprap and the new road. Two drainage culverts would be installed to allow runoff waters from the road and nearby lands to continue to drain to the river. The Jacksonville District has determined the project area is upstream of areas designated essential fish habitat (EFH) by the Caribbean Fishery Management Council. NMFS agrees with this determination and offers no comments under the EFH provisions of the Magnuson-Stevens Fishery Conservation and Management Act. 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.

The wetlands proposed for impact have been disturbed by previous development. During storms Otto and Irene, Rio Grande de Arecibo flooded PR-656 and caused scouring and road damage in several locations. The Puerto Rico Highway and Transportation Authority proposes repairs and improvements to this road that include: scour protection of the eastern bank; geotechnical stabilization of the road; geometrical, drainage and pavement improvements; pavement marking; new signing and replacement and improvements to the existing metal barriers. The Environmental Sensitivity Index (ESI) maps depict the project site as "Meandering Channel: Sand and Gravel Point Bars."

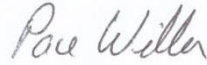
NMFS has no objection to the proposed bank stabilization and recommends and permit require use of best management practices to limit runoff from the site during and after construction. NMFS also prefers the bank stabilization be done with vegetation or reticulated mats that allow some vegetation to establish along the riverbank. However in this case, NMFS will defer to the Jacksonville District whether these "softer" approaches to bank stabilization are feasible at this location given river flows and soil conditions. NMFS will also defer to the Jacksonville District and its assessment of the overall public interest on



whether the public benefits from improving the water intake offset the loss of riverbank habitat and river bottom without requiring compensatory mitigation.

NMFS appreciates 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 US Army Corps of Engineers, 400 Fernandez Juncos Avenue, San Juan, Puerto Rico, 00901-3299. He may be reached by telephone at 787-405-3605 or by e-mail at Jose.A.Rivera@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:

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