

ATTACHMENT 28
COPY OF COMMENTS RECEIVED DURING THE
PRDOH ENVIRONMENTAL REEVALUATION
PROCESS

This Attachment summarizes the comments received from the public after the publication of the PN indicating the availability of the draft of the reevaluation of the proposed action by the PRDOH. Responses to them are also included.

A systematic process was used for responding to comments to ensure all substantive comments were tracked and considered. For tracking purposes, the comments received on the Project have been organized and grouped by the type of respondent (types of respondents being federal, state, or local agencies, or private entity which includes organizations or companies, and individuals), and the comments within each group were sequentially numbered to create "Commentor ID" as shown in the table below. then. The following pages provide copies of the coded letters and/or emails, with a side-by-side response to each coded comment.

Table Legend

Respondent Code	Respondent Type
FA	Federal Agency
MA	Municipal Agency
SA	State Agency
PE	Private Entity

#	Commenter ID	Commentor	Comment	Response to Comment
1	SA-001	Puerto Rico House of Representatives	Request to extend the period to provide the PRDOH with comments about this document is made.	In response to this request, the PRDOH responded that it is important to clarify that the 30-day public comment period that the Environmental Impact Statement draft for the PR-10 Project is currently going through is a preliminary one and is not mandatory (40 C.F.R. § 1503.1). This term provided precedes the official 30-day citizen comment period to which the final Environmental Impact Statement must be submitted, as required by the Code of Federal Regulations (40 C.F.R. § 1506.11).
2	SA-002	Puerto Rico House of Representatives	The second comments indicates that the document is extensive with over 7,000 pages of technical content written in English. Since most of the population to be affected by the proposed project construction does not speak English, it is requested to translate the document to Spanish.	With respect to this comment, there are two (2) jurisdictions that provide some guidance about this request. The first one pertains to local laws and regulations while the second one pertains to the federal regulations. A brief summary of the requirements set forth for each jurisdiction follows: Local Requirements The “Puerto Rico Official Languages Act” (“Act 1-1993”), as amended, <ol style="list-style-type: none"> 1. L.P.R.A. § 59, et seq., established Spanish and English as the official languages of the Government of Puerto Rico. 2. Both languages may be used, indistinctively, in all departments, municipalities or other political subdivisions, agencies, public corporations, offices and government dependencies of the Executive, Legislative and Judiciary Branches of the Commonwealth of Puerto Rico, pursuant to the provisions of this Act or by

				<p>that which is provided by a special law.</p> <ol style="list-style-type: none">3. When necessary, written translations and oral interpretations shall be made from one language to the other so that the interested parties can understand any proceeding or communication in said languages.4. The departments, municipalities or other political subdivisions, agencies, public corporations, offices and government dependencies of the Executive, Legislative and Judiciary Branches of the Commonwealth of Puerto Rico shall employ competent interpreters and translators, when necessary, to carry out the provisions of this Act. No public or private document shall be annulled on account of being written in one or the other of the official languages of Puerto Rico, pursuant to the provisions of this Act or by that which is provided by a special law.5. In addition, the provisions of this Act do not limit the constitutional rights of any person in any way, on account of the language which is vernacular to him/her or used by him/her as a means of expression. <p>Puerto Rico's governmental agencies that receive federal funds are required by law to take measures to provide reasonable access to Limited English Proficiency Persons (LEP). Even though English was declared an official language of the Government</p>
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				<p>of Puerto Rico under Act 1-1993, the agencies continue to be subject to the anti-discrimination provisions of Title VI. Act 1-1993 may establish additional obligations to serve LEP persons, but it cannot compel recipients of federal financial assistance, agencies, or private entities to violate Title VI.</p> <p>Federal Requirements</p> <p>As per the Language Access Plan (LAP) developed by the HUD, it is required to comply with Title VI of the Civil Rights Act and the Executive Order 13166 (referenced as Improving Access to Services for Persons with Limited English Proficiency). This document establishes types of documents referred to as vital documents. The requirement of the LAP indicates that translation of the documents is not an immediate need, but rather that is a function of the state of development and priorities of vital documents, which are defined as: "Paper or electronic written material that contains information that is critical for accessing a component's program or activities or is required by law. Vital documents include, for example: applications, model leases, disaster planning formation, consent, and complaint forms; notices of rights and disciplinary action; notices advising persons with LEP of the availability of free language assistance; and letters or notices that require a response from the beneficiary or client. For instance, if a complaint form is necessary to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services."</p>
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				Based on the previous information, even though that the Reevaluation documents is considered a vital document, if its extensive or voluminous, the Federal Coordination and Compliance Section Civil Rights Division of the Federal Department of Justice indicates that the translation of the fundamental information contained in the document is adequate for the purposes of the LEP. This regulation does not require the translation of the entire document. Therefore, it is understood that the translation of the body of the documents complies with requirements of the federal regulations.
3	SA-003	Puerto Rico House of Representatives	Due to the magnitude of the project, a request to perform public hearings for the project presentation is made.	The PRHTA/PRDOH are currently assessing this request, which shall consider the regulatory requirements applicable to this project.
4	SA-004	Puerto Rico House of Representatives	A request to provide ample notification to the public is being made, not only by publishing Public Notice in a newspaper.	The PRHTA understands that adequate notification to the public has been made to the residents of the areas through the years. This statement is validated by the comments received by the Mayors of Adjuntas and Utuado which have expressed their support for the completion of the construction of PR-10 that has been in process for many years.
5	PE-001	Ciudadanos del Karso	The entity indicates as its first comment that the Public Notice to adopt the Final Environmental Impact Statement for PR-10 is premature and unreasonable.	The purpose of the draft publication of the document is precisely to obtain comments from the public and government entities for its consideration and inclusion in the final document.
6	PE-002	Ciudadanos del Karso	The entity describes the population that will be affected by the project as one with	See Response to Comment 2.

			<p>very low levels of income and education, clearly an underserved community. The draft of 7,000 plus pages of technical text in English, constitutes a barrier to the majority of the Spanish speaking people of Adjuntas and Utuado. It is further requested to translate the draft to Spanish, make it available to affected communities and extend the time for comments.</p>	
7	PE-003	Ciudadanos del Karso	<p>A third comment indicates that when changes in conditions or new information is available, the National Environmental Policy Act (NEPA) requires the agency to disclose and analyze any impacts that may result from those changes. In the summary and conclusions section of the draft, the various bullets include the determination by your agency that the project remains generally unchanged.</p>	<p>The text of the document has been revised to clarify the changes that have occurred within the proposed project corridor and how they have been considered as part of the environmental compliance process with the FHWA and the Environmental Quality Board (EQB). As indicated in the document, changes have been made to reduce the environmental impacts of the project, including impacts to communities, as required by NEPA. The document intends to start each section with information from the 1979 FIES and supplanted with information of studies performed after the initial approval as function of the project development in stages. At all times consultations with agencies with jurisdiction on the project such as EQB, DNER, FHWA, SHPO and the USFWS have been maintained and required studies conducted. Construction of the highway up to its current condition has continued through the years as funding becomes available.</p>

8	PE-004	Ciudadanos del Karso	<p>This statement is not correct as much has changed since 1979, including the alignment of the highway. The corridor of the project was subjected to multiple landslides due to more than one hurricane including Hurricane María, which are not mentioned in the draft and how it affected the existing PR-10 along Arecibo-Utuado and Adjuntas and the cost to repair them. Similarly, there is no analysis of the hydrological predictions consider rainfall events associated with the hurricanes María and Fiona.</p>	<p>The mentioned statement has been qualified as to its applicability within the document. Reference to impacts within the corridor vegetation and landslides has been incorporated in sections 3.2.1 Land Development and 3.2.4 Natural Features of the document.</p>
9	PE-005	Ciudadanos del Karso	<p>In fact, the 100-year rainfall prediction of the hydrological study is lower than the actual rainfall during the hurricanes. The accuracy of the hydrological findings in the draft are in question when designs that resulted from those predictions are not considering these future extreme events and how to manage them effectively. After assuming that there had not been no significant change in conditions since 1979,</p>	<p>Adequate provisions have been considered for the design of the required structures along the path of the proposed project. Therefore, information obtained from the project designer serves to address this comment as follows:</p> <ul style="list-style-type: none"> • 24-hour 100-year precipitation Information obtained from the National Hurricane Center Tropical Cyclone Report, the total precipitation between September 19 and 21 (during Hurricane María) recorded for the pluviometer located in Utuado was 18.18 inches. During Hurricane Georges (the total precipitation was 28.36 inches in Jayuya and 24.62 inches in Lago El Guineo in Villalba. On both incidents, the 24-hour precipitation is lower than 20 inches. The H/H

			<p>the authors of the draft isolated the analysis from several extreme events that need to be considered to improve the planning of the project and assure public safety.</p>	<p>study considered a 24-hour precipitation event of 22.4 inches, which is higher than the ones reported during Hurricane María and Georges. Therefore, the design of the structures considered the extreme events mentioned in the comment and assure the safety of the public.</p> <ul style="list-style-type: none"> • Increase in water levels of the river during a 500-year recurrence event <p>Although this increase would be highly variable, an average of 0.28 meters can be reasonably predicted using models, However, the proposed project structures will have a freeboard of at least 24 inches. This will ensure that rain events of this magnitude will not affect the operations of the proposed roadway.</p> <ul style="list-style-type: none"> • Impact of Hurricane María on vegetation with respect to Curves Number (CN) used for H/H Studies <p>The CN is primarily a function of the soil characteristics. Therefore, the change in vegetation resulting from the effects of a hurricane in an area is attenuated as a function of time since vegetation will revert to its previous condition in a natural way.</p>
10	PE-006	Hannael Asociados, Inc.	<p>Use of the “Generally Unchanged Conditions.” The first comments refer to the use of the phrase “Generally unchanged conditions” in the document that commenter understands is made to analyze changes in conditions and the proposed action surface or new information becomes available.</p>	<p>The mentioned statement was used to describe that the existing conditions of the area in terms of commercial/industrial/residential uses that reflect the fact that they remain generally the same along the path of project corridor. It was not used to imply that environmental conditions are the same as of 1979. This statement has been qualified in the text of the document, and additional information pertaining to changes in vegetation, land cover, impacts of landslides and hurricanes have been incorporated in the discussion. Also, additional details</p>

				<p>pertaining to the H/H studies that were performed for the project which considered the recent natural events has been included in section 3.2.1 of the reevaluation.</p>
11	PE-007	Hannael Asociados, Inc.	<p>Changes in Population in the Project Corridor. This comment indicates that the trend toward the reduction in the population in the area is the result of the hurricanes.</p>	<p>To address this comment, additional US Census population data from previous decade (2000) was added to the text of the reevaluation, and information about this subject reviewed. A review of the available database for the Island, clearly shows that since 2000, a trend toward the reduction of the populations is observed (see Section 3.1.16 Environmental Justice) has been occurring. Therefore, although it is recognized that in the short-term hurricane María exacerbated this condition, the trend has been established before the occurrence of this natural event.</p> <p>Also, the purpose of the information was to verify as required by Executive Orders that minority or low-income populations inhabiting the project area are not disproportionately impacted. Therefore, the information obtained from official sources allow to establish the fact that the existing population along the proposed project corridor is homogeneous with respect to the mentioned characteristics. It is also important to indicate, as discussed in the reevaluation, that the ROW required for the project construction has been completed except for some properties located in Section IV.</p>
12	PE-008	Hannael Asociados, Inc.	<p>Translation of Documents. This comment pertains to the request to translate the document to Spanish, since it is indicated that language</p>	<p>See Response to Comment 2.</p>

			becomes a barrier to the people of Adjuntas and Utuado.	
13	PE-009	Hannael Asociados, Inc.	Time for Comments submittal. This comment pertains to the request to extend the time for comment submittal.	See Response to Comment 1.
14	PE-010	Hannael Asociados, Inc.	Paragraph 1 of the comments of this section indicates that changes in the alignment were necessary to deal with the need to avoid some steep topography of the region. Even small deviations in the alignment have significant implications in the amount of soil and rocks that must be moved, the magnitude of the cut and fills, and the number of bridges to be constructed.	A brief discussion of the changes in alignment of the proposed project within the corridor of alternatives developed so far and those discussed in the EIS between Adjuntas – Utuado has been incorporated in section 1.2 of the reevaluation, including a map illustrating the proposed project alignment and its various adjustments in a section of the topographic quadrangle map published by the USGS. Said map also identifies alternative alignments 2B revised and 2A that were discussed in the FEIS. As may be observed from the figure, the proposed project alignment has been realigned to lower elevations to reduce the need for extensive cut and fill earthwork activities during the construction phase of the project.
15	PE-011	Hannael Asociados, Inc.	Paragraph 2 of the comments of this section addresses the fact that tropical landscapes and vegetation are extremely dynamic. Therefore, the changes that may have occurred for Puerto Rico during a period of 40 years should be sub-estimated. It is indicated that in 40 years forests in	The validity of these comments is being acknowledged, and recent information obtained from published USDA Forest Service reports has been incorporated in section 3.2.4 Natural Features of the reevaluation. Results of the analysis of the impacts of hurricane María to the forested zones of Puerto Rico developed with the assistance of the USDA have been also included. With respect to the wildlife studies performed along the path of the proposed project, it shall be indicated that they have been performed with the assistance of the

			<p>Puerto Rico have doubled in age as per the USDA Forest Service investigations. The assumption that the forest structure and composition that was assumed to be static in the draft is not correct. To assess these changes, it is recommended to consult the USDA Forest Inventory and Analysis Program since the results of their inventories is publicly available. Finally, a comment about the impacts of the changes in vegetation in the wildlife studies performed to justify the PR-10 in 1979 would also change given the maturation of the vegetation.</p>	<p>DNER/USFWS. After completion, they were submitted for their review and approval which is reflected in their endorsements. A review of the Birds of Prey reports disclosed the fact that GIS data for land cover obtained from the US Forest Service along the path of the studies was used in the analysis for this specie</p>
16	PE-012	Hannael Asociados, Inc.	<p>Sediment Issues. The main statement of this section of the comments letter pertains to the technical challenge of the earthwork activities required for the construction of PR-10. The comments refer to the changes in the alignment of the roadway after its initial proposal in 1979 to minimize the costs and reduce the environmental impacts. A recommendation to comply with the</p>	<p>Comments about the lack of commitments of contractors, state, and federal agencies with respect to the sediment control practices are expressed and that it is not clear how the agency will contain the tonnage of rocks and soil that will be moved by this project. Also, a statement indicating that draft document cannot assure that the waters of the Rio Grande de Arecibo will not be polluted by sediments and there is no analysis of the potential sedimentation of the river channel. This section of the comment letter concludes with the statement that chocolate-color waters draining from the mountain to the coast will be a surprise to Puerto Ricans.</p>

			mandatory DNER described in the environmental commitments sections is made as well as to incorporate a description of the permanent erosion and sediment control measures.	To adequately address these comments, additional information pertaining to the impacts of sedimentation and turbidity has been incorporated in section 3.2.1 Land Development Soil Suitability / Erosion / Drainage / Storm Water Runoff of the reevaluation.
17	PE-013	Hannael Asociados, Inc.	Hurricane María. Comments request the discussion of how the project would address the impacts of sediments and landslides on the project. Lack of discussion addressing the landslides induced by Hurricane María in the Utuado – Adjuntas region, including those pertaining to the already constructed sections of PR-10. Specific reference to research showing that landslides are more common along road corridors, on sites with the geology of Utuado (granodiorite) and after María are detailed. The commenter requests that the draft shall address these hazards effectively and comprehensively.	Information detailing how the potential impacts of landslides would be addressed during the project construction has been included in section 3.2.1 Land Development Soil Suitability/Erosion/Drainage/Storm Water Runoff of the reevaluation.
18	PE-014	Hannael Asociados, Inc.	Concluding Observations. It is required to include in the document related with the lessons learned from the sections already	A discussion about the impacts experienced for the area in the aftermath of Hurricane María and Climate change have been included in the revised document. It has been established in the document, that the results of the soil studies

			constructed and in use of PR-10.	performed for the project area have been considered and incorporated in the design of the project to minimize the disruption of the new highway once it is completed and provide a safer route for its users. However, although it is not possible to state that landslides would not occur in the future, it is possible to indicate that engineering studies have provided and will provide special attention to prevent this type of incidents.
19	PE-015	Para La Naturaleza	The first comment indicates that the document is complex and extensive and expressed that the period of 30 days allowed for the public to provide comments about the document is not adequate. The complexity of the appendixes is also cited as a reason to provide additional time to provide comments.	The purpose of the draft publication of the document is precisely to obtain comments from the public and government entities for its consideration and inclusion in the final document. With respect to the limitation of 30 days to provide comments about the document, the PRDOH responded by email that: <ul style="list-style-type: none"> • It is important to clarify that the 30-day public comment period that the Environmental Impact Statement draft for the PR-10 Project is currently going through is a preliminary one and is not mandatory (40 C.F.R. § 1503.1). • This term provided precedes the official 30-day citizen comment period to which the final Environmental Impact Statement must be submitted, as required by the Code of Federal Regulations (40 C.F.R. § 1506.11).
20	PE-016	Para La Naturaleza	The entity subscribes the comments issued by Pedro Saadé, Esq., and Mr. Ariel Lugo.	The comment is acknowledged.
21	PE-017	Utrero	I disagree; a lot of wildlife and natural resources are lost. What they need to do is fix all the roads.	Improvements to existing PR-123 are part of the Improvement Transportation Plan of PRHTA. Additional information regarding why the reconstruction of PR-123 is not recommended in lieu of the proposed project is explained on

				page 14 and 15. Mitigation measures and modifications in the design of the roadway have significantly reduced the proposed project's impact on the surrounding environment. Efforts to additionally reduce impacts will be taken in the final design stage of the remaining sections that have not been completed.
22	PE-018	Att. Pedro Saadé Llorens	The first comment indicates that the document is complex and extensive and expressed that the period of 30 days allowed for the public to provide comments about the document is not adequate. The complexity of the appendixes is also cited as a reason to provide additional time to provide comments.	See Response to Comment 18.
23	PE-019	Att. Pedro Saadé Llorens	It is required to provide a translation of the technical documents included as attachments of the reevaluation.	See Response to Comment 2.
24	PE-020	Att. Pedro Saadé Llorens	Based on the review of the document, Mr. Saadé indicates that a copy of the 2022 Reevaluation approved by the FHWA was not included.	Copy of the 2022 Reevaluation included as Attachment #6 of the draft document.
25	PE-021	Att. Pedro Saadé Llorens	There is a request to include in the discussion an Alternative Analysis.	No alternative analysis was included because basically the project considers the alignment discussed as Alternative 2A of the original FEIS and the one included in the latest reevaluations. The other alternative would be the no construction

				<p>alternative. It is important to indicate that this document pertains to the completion of a project for which a FEIS was approved, and which included an extensive discussion of alternatives alignments. The proposed project conforms to the preferred alternative that has been refined through the years.</p>
26	PE-022	Hector Quintero Vilella, PhD	<p>2002 Flora and Fauna Study. Commenter indicates that there are significant differences between the alignments from the 2002 study performed by himself and the current one. The commenter indicates that approximately 53% of the current alignment was not analyzed based on a review of the 2002 study alignment figure (which was performed by him) and that the biodiversity of this section of the alignment is higher. Therefore, only 47% of the alignment was included in his study. It also indicates that the reevaluation indicates that the studies were performed to maintain the validity of the DNER/USFWS endorsements.</p>	<p>A review of Figure 1 included in the comments shows two alignments. The red one corresponds to the proposed project alignment while the yellow one is intended to present the flora/fauna study prepared in 2002. It is based on the comparison between both figures that the commenter indicates that approximately 53% of the alignment was not studied at that time. However, the provided figure does not provide a copy of the alignment used in the- 2002 study in support of this comment-s. It appears that the figure was generated using a FEMA panel for illustration purposes. After conducting a review of the PRHTA records, the figure used for the preparation of a recertification request of the FEIS presented to the EQB, date indeed shows a variation in the northern portion of the 2002 alignment when compared with the proposed project corridor. This corresponds to the alignment referenced in this comment. After observing the figure, it is noted that the southern portion of the alignment (which runs toward the west side of the Adjuntas lake until its center section) does not show a visible significant deviation between them. However, the divergence between both alignments near its center part with respect to the Rio Grande de Arecibo appears to be lower when using the alignment</p>

				<p>included in the EQB submittal. This may be the result of the scale of the figures used for the comparison but serves to confirm the fact that a difference between the alignments with a shift toward the northwest is observed as a result of the project design stage and goal of reducing environmental impact on the natural resources resulting from earthwork activities required for the construction of the project. The resulting realignment, which was used to show the proposed project appears closer to alternative 2A discussed in the EIS. The new alternative was presented in a public meeting held at the Municipality of Utuado in March 2002 to the general public and government agencies.</p> <p>To address the observed difference in alignments indicated by the commenter, it is important to note that, as indicated in the reevaluation, communications with the DNER/USFWS have been maintained during these years, including submittal of the updated construction drawings available at the time of their consultation. In addition, additional studies have been conducted along the path of the proposed project corridor as discussed in section 3.1.7</p> <p>Endangered Species to update the status of their presence in the project ROW. This section, explicitly indicates that:</p> <ol style="list-style-type: none">1. A study to assess Presence/Absence of two Puerto Rican endangered forest raptor species; Broad-Winged Hawk (<i>Buteo platypterus brunnescens</i>) (BWH) and Puerto Rican Sharp-Shinned Hawk (SSH) (<i>Accipiter striatus venator</i>)
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				<p>which were designated as Target Species (“TS”) was conducted for sections II, III. And IV of the proposed project alignment at the request of the USFWS. A review of the studies clearly indicated that a review of the project corridor was performed between June 2013 and May 2014. Said study included field visits.</p> <p>2. The Flora and Fauna Management Plan for Construction of the Puerto Rico State Road PR-10, Sections II-V, Utuado-Adjuntas, Puerto Rico of September 2022 was included in Attachment 24 of the reevaluation (referred to as the Field Protocols) was revised and approved by the DNER and pertains to the following species:</p> <ul style="list-style-type: none"> • PR BOA (PRB) (<i>Chilabothrus inornatus</i>) • PR Broad-Winged Hawk (PRBWH) (<i>Buteo platypterus brunescens</i>) • PR Sharp-Shinned Hawk (PRSSH) (<i>Accipiter striatus venator</i>) • PR Parrot (PRP) (<i>Amazona vittata</i>) • PR Harlequin Butterfly (PRHB) (<i>Atlantea tulita</i>) • <i>Oplonia spinosa</i> (Host plant for ovoposition of <i>A. tulita</i>) • <i>Cornutia obovate</i> • <i>Pleodendron macranthum</i> • <i>Solanum ensifolium</i> • <i>Myrcia paganiik.Varronia bellonis</i> <p>The plan also discusses in Section IV previous Flora/Fauna information</p>
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				<p>collected from the proposed alignment impact area which is:</p> <ul style="list-style-type: none">• Flora and fauna study by OIKOS at previous alignment route and an additional alternate route (2001-2002): Flora and Fauna Inventory. The study specified that No Endangered species were observed. However, it did mention a single anecdotic report of PRSSH from outside the study area and that the presence of PRB was not confirmed but it is probable due to the habitat characteristics. Revising the list of plants reported, Oplonia spinosa was not observed. (This is the study prepared by Dr. Hector Quintero referenced in his comments to this document.)• Puerto Rican Boa (<i>Chilabothrus inornatus</i>) (PRB) protocol implemented during soil study and service road opening by GBA, Sections II, III and IV (2013-2014): Field workers training, field search before and during the service road opening, along trails, along creeks and at abandoned human dwellings. No endangered species were observed.• Puerto Rican Sharp-Shinned Hawk (<i>Accipiter striatus venator</i>) (PRSSH) search during soil study and service road opening by GBA, Sections II, III and IV (2013-2014): Field workers training, field search (including nesting season) from fixed observation
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				<p>points, walking along the service road, forest trails and creeks. Call reproduction to stimulate response. No endangered species were observed.</p> <ul style="list-style-type: none"> • Puerto Rican Broad-Winged Hawk (<i>Buteo platypterus brunessens</i>) (PRBWH) search during soil study and service road opening by GBA, Sections II, III and IV (2013-2014): Field workers training, field search (including nesting season) from fixed observation points, walking along the service road, forest trails and creeks. Call reproduction to stimulate bird response: A single individual was observed once at a fixed observation point in Section III. • Vegetation description, including historical aerial photography analysis (1930's) for the purpose of developing a GIS based Habitat Suitability Model for PRSSH and PRBWH. • The USFWS IPAC web system official species list, reports one reptile species (PRB) and three bird species (PRP, PRBWH, PRSSH) for the project area. The database review covered a radius of 500 meters (see Attachment II of the Plan). <p>An updated description of the vegetation included in this report was incorporated in section 3.2.4 of the reevaluation.</p>
27	PE-023	Hector Quintero Vilella, PhD	The commenter indicates that due to the time frame between the 2002	See response to the previous comment. The contents of the reevaluation were revised to clarify the statement.

			<p>study and 2023, 21 years have passed, and the ecological systems are dynamic, and the flora/fauna can change significantly during this time. Also, it indicates that scientific literature documents that hurricanes can impact the vegetation, creating open spaces where new species could colonize easily. In addition, an increase in the number of landslides can also create new open spaces and rebut the statement of page 15 that indicates: "It is important to indicate that as may be observed from Attachment 3, the natural environment across which this highway corridor traverses have not changed in a significant way after all these years.... ". This satellite figure does not have any scientific validity to state that the natural environment along the path of the proposed PR-10 has remained stable during these years. It is imperative that updated field studies be performed to determine the</p>	
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			impacts on flora and fauna.	
28	PE-024	Hector Quintero Vilella, PhD	<p>This comment refers to page 24 of the Reevaluation where it is indicated that various studies have been performed since 1994 to maintain the validity of the endorsements obtained from the DNER and the USFWS. One of those studies is a study for six plant species: Cordia bellinis, Ottoschulzia rhodoxylon, Solanum drymophyllum, Juglans jamiacense,, Polystichum cordeonense and Cornuvia obovata by Frank Axelrod in June 2022. This study is not included in the attachments of the document.</p>	<p>It shall be noted that the correct date for the study was June 2002, and the citation revised accordingly in the document. The study covered the following plant species: Cordia bellonis, Ottoschulzia rhodoxylon, Solanum drymphilum, Juglans jamiacense, Polystichum corderoense and Cornuvia ovobata. A copy of said document has not been included in the Reevaluation. It was prepared for Section I of PR-10 which has already been constructed and in operation toward the north of Section II of the proposed project corridor. It was mentioned as a reference because it was conducted after 1994 and proves that the project corridor biological studies and data collection has continued through the years. It is important to indicate that the studies have been performed at the request of the DNER and the USFWS to maintain their endorsements. In addition, the DNER approved the Flora/Fauna Management for the protection of all the species which have not been found along the path of the proposed project corridor during as discussed in Section 3.1.7 Endangered Species of the Reevaluation. A copy of the document has been included in Attachment 24 of the reevaluation as previously mentioned.</p>
29	PE-025	Hector Quintero Vilella, PhD	<p>Distribution and abundance of the Endangered Puerto Rico Broad-winged Hawk (<i>Buteo platypterus brunnesces</i>) and the Puerto Rican Sharp-shinned Hawk (<i>accipiter striatus</i></p>	<p>The referenced study by Francisco J. Virella was performed for Section I of PR-10 which bounds the proposed project toward the north and is currently in operation. However, a more recent study targeting the mentioned species was conducted between May 2013 and 2014 at the request of the USFWS by the firm Gabriel Berriz and Associates (GBA)</p>

			<p>vennator), Francisco J. Virella (sic) 2004 In page 24 reference is made to a report prepared by Vilella in 2004 for the Endangered Puerto Rico Broad-winged Hawk (<i>Buteo platypterus brunnesces</i>) and the Puerto Rican Sharp-shinned Hawk (<i>accipiter striatus vennator</i>).</p>	<p>for Sections II, II and IV of the proposed Said study was included in Attachment 20 of the Reevaluation. The study concluded that none of the species were observed along the path of the proposed project corridor.</p>
30	PE-026	<p>Hector Quintero Vilella, PhD</p>	<p>Cumulative Impacts (Pages 47-49)</p> <ul style="list-style-type: none"> • Effect of increase in vehicular traffic and impacts to birds. It is indicated that there are studies that prove that that an increase in vehicles and their travel velocity results in an increase in direct impact to vehicles, especially owls. • Effect of the increase of vehicular traffic and impacts on insects. It is indicated that an increase in the mortality of insects is as a result of an increase in vehicular traffic. This in turn has an indirect and cumulative impact in other species that feed with 	<p>The first mitigation measure aimed to reduce impacts to flora and fauna, including Federally listed (endangered or threatened) and Commonwealth listed (critically endangered, endangered, vulnerable, or critical) species was the analysis of alternatives routes through an Environmental Impact Statement (EIS) document subject to the evaluation of specialized agencies and the general public. Through this process and further updates actions to minimize and/or avoid potential impacts to flora and fauna species and to their habitats, where developed in consultation with the USFWS and the DNER as specialized agencies with the expertise on ecological aspects. The selected Build Alternative resulted in a reduction to the potential areas where critical or endangered species are located. In addition, the development of the project through Build Alternative. Nonetheless, measures and conservation protocols to minimize the potential impacts of the development of the proposed project includes:</p> <ul style="list-style-type: none"> • Reforestation of green areas is recommended, in compliance with the

			<p>insects such as birds, reptiles, amphibians, and others. The proposed route passes toward the west side of the Rio Grande de Arcibo, which has a low population and therefore less disturbance to the natural systems. This impact may be important, but mitigation measures are available.</p> <ul style="list-style-type: none"> • Habitat fragmentation 	<p>requirements of the Joint Regulation and with Act 97 of June 25, 1998, "Act to Foster the Planting of Fruit and Seed-Bearing Trees which Provide Food to Wild Bird Species of Puerto Rico". Prior to the beginning of the construction phase, a tree inventory and reforestation plan must be submitted to OGPe as required by the Joint Regulation.</p> <ul style="list-style-type: none"> • If any protected flora and/or fauna specimen is found, the construction contractor will place an orange safety fence along the perimeter and identify the area as an Ecological Sensitive Area. The location of any protected or threatened flora specimen(s) found during construction must be marked by a surveyor and included in the construction drawings. The DNER will be notified and will determine the action to be followed, including compliance with the requirements of Act 241 of August 15, 1999 (New Wildlife Act) and Regulation 3250 to Govern the Threatened and Endangered Species of the Commonwealth of Puerto Rico. • Natural habitat will be mitigated in compliance with the requirements of Act 241. This was coordinated with the DNER and the USFWS. • Protocols to manage critical species, such as the Boa de
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				<p>Puerto Rico (<i>Epicrates inornatus</i>), were agreed.</p> <ul style="list-style-type: none">• All construction activity will be kept within the established limits, which will be marked in the field before the construction period starts, to minimize impacts to natural systems outside the construction area. Staging areas will be located inside the established limits; if any staging areas outside the established limits are needed, they will be in areas that will not pose an impact to protected or endangered species, bodies of water, or wetlands.• Integrated vegetation management practices on roadsides and other transportation rights-of-way, including reduced mowing.• The construction contractor will receive information about the general and special conditions that must be complied with and that are part of the environmental permits that will be obtained to work near wetlands, bodies of water, and areas that are potential habitats of threatened species.• Temporary increases in noise levels during the construction phase, caused by construction equipment, may influence the species closest to the project area. The hours of operation of the construction equipment will be kept within regular working hours; nevertheless,
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				<p>when necessary, night shifts could be required.</p> <p>In reference to impact to Owls, we do not find any study performed for the species in Puerto Rico. Nonetheless, we encountered a paper presented at the Third International Partners in Flight Conference, March 20-24, 2002, Asilomar Conference Grounds, California, which refers to Owls in Central Valley of California. Further studies to evaluate the fence recommendation were not found.</p> <p>“Several species of owls, particularly Barn Owls (<i>Tyto alba</i>), Great Horned Owls (<i>Bubo virginianus</i>), and Short-eared Owls (<i>Asio flammeus</i>), often forage near roads at about the same height as vehicle windshields and are common victims of vehicle collisions. In the Central Valley of California, juvenile Barn Owls suffer heavy mortality from vehicles along Interstate 5 and smaller county roads (Moore and Mangel 1996). No mitigation has been attempted in this case, however, a concept similar to the Sebastian Inlet State Park barrier poles may be effective for owls as well. If so, a low fence or fence material such as plastic construction fence or closely spaced, frangible reflective highway markers may be effective if installed along highway verges and medians.”</p> <p>Sandra L. Jacobson; Mitigation Measures for Highway-caused Impacts to Birds, Third International Partners in Flight Conference, March 20-24, 2002, Asilomar Conference Grounds, California.</p> <p>“Conclusion”</p> <p>There are few data regarding the impacts of highways on birds and fewer on the effectiveness of the relatively few mitigation measures devised to reduce those effects.</p>
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				<p>open and natural space of the proposed road and our tropical environment, the first one is not foreseen and the second does not apply.</p> <p>“Abstract”</p> <p>In the last few decades, mounting evidence points to a negative impact of roads on several groups of animals. Most studies on the effects of roads on animal populations concentrate on vertebrates, and only a few on insects. It is difficult to determine the real effects of roads on insects due to the variety of methods used. We review recent literature examining the ecological impact of roads on insects. The objectives of our synthesis are to gain insight into the effects of the construction and operation of a road on insect groups, and to determine the gaps of knowledge. We found that roads negatively affect the abundance and diversity of insects due to two main factors: (1) the high mortality of some groups when crossing the road, with more impact at higher traffic volumes. (2) The unwillingness of many species to cross a road or live close to it. Roads are major barriers for small or flightless species, although the response varied for flying species. Finally, both experimental and observational evidence support the idea that air pollutants and de-icing salt used for the road maintenance negatively affect insects.” Effects of roads on insects: a review Pilar Tamayo Muñoz • Felipe Pascual Torres • Adela Gonzalez Megias. Emphasis supplied.</p> <p>In addition, information about road mortality from the Flying insect abundance declines with increasing road traffic by Amanda E. Martin, Shannon L. Graham, Melissa Henry,</p>
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				<p>levels of traffic noise. Given the lack of empirical data on this point, it is recommended that subjective human experience with the noise in question be used as an interim guideline to estimate acceptable noise levels for avoiding stress and physiological effects. Noise types and levels that appear to increase stress and adverse physiological reactions in humans may also have similar consequences in birds.”</p> <p>California Department of Transportation; Technical Guidance for Assessment and Mitigation of the Effects of Highway and Road Construction Noise on Birds, June 2016. Emphasis supplied.</p> <p>Thus, with Federal Highway Administration Final Environmental Impact Statement (F-EIS) Compliance and its updates; the U.S. Fish and Wildlife Service (USFWS) Endangered Species Act (ESA) Section 7 compliance determination and the Puerto Rico Department of Natural and Environmental Resources (PRDNER) endorsement and conservation measures agreements, the effects of traffic and construction on federally listed species, including birds, the flora / fauna aspects have been adequately attended.</p> <p>A final observation pertaining to the habitat fragmentation is that by shifting the proposed alignment further east up to where Alternative 2A was considered in the EIS, the fragmentation in section II the segmentation of habitat is reduced. A similar effect is obtained by the proposed alignment in Sections III, IV and V when compared to alternative 2B.</p>
31	PE-027	Hector Quintero Vilella, PhD	Pollution of rivers and creeks. It is indicated that vehicular traffic	It is estimated that the operation of the project will have a potential impact on the surface bodies of

			<p>would result in the generation of pollutants such as small amounts of oil, and other liquids such as ethylene glycol, brake fluid, grease, and others. These pollutants are flushed by the storm water. Since the project has more than 20 bridge structures crossing over creeks and rivers, the quantity of pollutants may be considerable. The document does not analyze the direct impact of those types of discharges to surface bodies of water. An accident may have a catastrophic impact on important sources of potable water.</p>	<p>water that will be crossed. According to the FHWA, highway runoff can have potential impacts if no measures are taken for the removal of excessive contaminants before it reaches the receiving water. The most common contaminants in highway runoff are heavy metals, inorganic salts, aromatic hydrocarbons, and suspended solids that accumulate on the road surface because of regular highway operation and maintenance activities. Ordinary operations and the wear and tear of our vehicles also result in the dropping of oil, grease, rust, hydrocarbons, rubber particles, and other solid materials on the highway surface. These materials are often washed off the highway during rain events. The potential impacts of highway runoff water quality can be minimized through the installation of structural or non-structural BMPs or a combination of both. Structural BMPs are used to physically trapping runoff until contaminants settle out or are filtered through the underlying soils; non-structural BMPs, on the other hand, are source control practices such as street sweeping, land use planning, vegetated buffer areas, and fertilizer application controls, and are used to reduce the initial concentration and accumulation of contaminants in runoff. The decision of which is the most appropriate BMP will depend on the expected amount of runoff, type and amount of contaminants, and physical characteristics of the site, and will be made during the design of the project. As in the constructed segments of the PR-10 project, the drainage system will incorporate the necessary devices to trap debris,</p>
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				<p>trash, oil, hydrocarbons or solid in suspension before they reach the points of discharge , to maintain the quality of the runoff water to prevent contamination of surface and groundwater. Such actions or mitigation measures includes:</p> <ul style="list-style-type: none">• If the construction activity or phase will disturb one (1) or more acres, the contractor shall obtain a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of runoff from construction projects, and will prepare a SWPPP, which shall include the best management practices to be implemented, including keeping the trees that are found near (both inside and outside) the construction area; the use of sedimentation control barriers, hay bales, temporary rock structures, turbidity barriers, lagoons or other types of retention systems, and/or gabions; and the planting of grass, shrubs and trees on slopes, among others. A CGP application will be submitted to OGPe for approval prior to the beginning of any construction activity.• Accesses to project areas under construction will be clearly defined in the MOT for that location. Construction areas will be protected from both construction traffic and regular traffic to avoid material disturbance and further contamination and will be prepared and
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				<p>compacted prior to their use. Construction traffic will not be allowed outside these areas.</p> <ul style="list-style-type: none"> • Accumulation of debris and other material that could be easily transported by runoff will not be allowed in construction areas. • Oil and other related materials will be stored in designated areas only; a Spill Prevention, Control and Countermeasures Plan (SPCC) will be developed and implanted to avoid and/or minimize oil spills that could reach bodies of water. • After the project has been completed, the area will be stabilized through the planting of vegetation and soil compacting. • Construction of berms along roads to avoid spills or runoff from entering surface and ground water.
32	PE-028	Hector Quintero Vilella, PhD	<p>In the alternative analysis of this document, only the no alternative action is considered. In the FEIS, 12 alternatives were analyzed and ultimately three remained in the analysis. The alternative to improve the existing roadway was discarded. Due to the time that has passed and the advances in the design techniques, the improvement of current PR-123 as a</p>	<p>The alternative analysis is limited to the completion alternative and no construction alternative since this proposed project goal is to complete the construction of PR-10 as this is the proposed project. The proposed project has been incorporated in the transportation and local land use planning. The disadvantages of the improvements to PR-123 discussed in the EIS remain the same (and in pages 14 and 15 of the reevaluation). Advancement in design does not preclude the fact that improvements to PR-123 would require to perform extensive earthwork activities due to the existing abrupt slopes observed adjacent to PR-123, impacts on ROW and the maintenance of the</p>

			<p>viable alternative is being proposed.</p>	<p>operation of PR-123 while constructing improvements that does not warrant the same level of safety and efficiency as the construction of a new section of PR-10 within a ROW that has been acquired (except as some properties of section IV) as indicated in the reevaluation.</p>
<p>33</p>	<p>PE-029</p>	<p>Hector Quintero Vilella, PhD</p>	<p>Mr. Quintero indicates that the statement that the project does not impact prime farmlands based on the NRCS definition is not accurate. It further indicates that this statement is repeated many times in the report to indicate that no agricultural lands would be impacted by the proposed project. In support for his comment, he provides a definition of the 'Important farmlands' obtained from the Federal Register (§ 657.5 Identification of important farmlands) and indicates that both definitions are similar but adds the characteristic of low slope (5 to 7 degrees). This may be the reason as to why the DA does not qualify the soils along the path of PR-10 as prime farmland. However, it is known that this central area has served for the production of</p>	<p>The document does not state that the area has no agricultural value, but rather that it has not been identified as prime farmland by the DA as required by regulations. The statements presented in the document reflect the review of the official DA database upon which the determinations are made.</p>

			different types of crops.	
34	PE-030	Francisco J. Vilella, PhD	Mr. Virella expressed concern that a study along the path of the proposed project corridor has not been performed. He has no knowledge of the project between Adjuntas and Utuado.	This statement is correct. Mr. Virella did perform a study for these species along the corridor of PR-10 but for the northern section close to the Rio Abajo Forest, not in the proposed project corridor. The purpose of including the performance of his study was to provide support to the statement that after the FEIS approval studies have been conducted along the path of the project.
35	PE-031	Francisco J. Vilella, PhD	The terrestrial network of highways in Puerto Rico results in one of the most fragmented places in the world. It is indicated that the "roadway habitat" that have been documented to constitute poor quality habitats where risks to species that depend on the availability of close and continuous canopy. This affects the BWA and SSHA endangered bird species.	The proposed project will include the construction of PR-10 as originally planned. The PRHTA does not have projects for the construction of additional roadways within this region. As mentioned by Mr. Vilella, natural events such as hurricanes also contribute to the fragmentation of the habitat. To address these impacts the PRHTA has: <ul style="list-style-type: none"> • Maintained communications with agencies with jurisdiction such as the DNER/USFWS. • Developed a Flora/Fauna Management Plan that incorporates the populations of the mentioned species (BWA and SSHA). Said plan was approved and included in the reevaluation document. • Provided mitigation measures such as the acquisition of a 370 "cuerdas" property that was already transferred to the DNER. • Shifting the proposed alignment further east on Section II.

36	PE-032	Francisco J. Vilella, PhD	<p>Recommends performing field surveys between December – March to assess the presence of the species (BWHA and SSHA) along the path of the proposed project corridor. It is recommended to extend to study corridor 300 meters at both sides of the proposed project alignment. If mitigation is required, recommends acquiring properties near the Tanamá or Rio Grande de Arecibo that may help to improve the connectivity between protected areas. Therefore, any activity that improves the connectivity of the Rio Abajo Forest with other conservation units (i.e., Guajataca, Guilarte) would result in benefits for the species.</p>	<p>Field surveys for the presence of the species were conducted between 2013 -14 along the path of sections II, III and IV of the proposed project as required by the USFWS. Said studies were submitted and approved by the agency. During the early stages of the preparation site visits with the assistance of the USFWS field Biologist were conducted, as described in the report that was included as Attachment 20 of the reevaluation. A qualified biologist team capable of conducting monitoring activities and implementing conservation measures for the protection of protected species shall be contracted and will be monitoring the corridor of the proposed project, before, during and after the construction of the project. This environmental team will review the corridor to assess, among other things, changes in the area, implement the protocols approved for this project and determine if conditions have varied due to the passage of time or the final design of the proposed project, in order to make adjustment to the design if warranted.</p>
37	PE-033	Maria Carabello	<p>I disagree due to the environmental damage to the rural area, contamination of our waters, and destruction of the protected Archaeological Sites in this zone.</p>	<p>The protection of the environmental resources along the project's corridor is of the utmost importance. The Reevaluation of the FEIS has in Section 3.3 (on page 44 of the document), mitigation measures that will be taken during the construction and operation of the roadway. The archeological studies indicated that no historical, architectural, or archeological resources will be affected, and a No Adverse Effect Determination was issued by the State Historic Preservation Office (SHPO).</p>

38	PE-034	Laura Hernandez	<p>I COMPLETELY DISAGREE WITH COMMITTING THIS ENVIRONMENTAL CRIME, CAUSING SERIOUS DAMAGE TO WATER BODIES. THEY ARE IGNORANTLY CREATING SO MUCH DESTRUCTION FOR A ROAD. IT'S ABSURD THAT A ROAD IS VALUED MORE THAN WATER BODIES, ECOSYSTEMS, NATURAL RESOURCES. I OPPOSE THIS CONSTRUCTION. (The original comment was in all caps.)</p>	<p>The environmental studies realized through the environmental process determined that the proposed action will not have a significant adverse effect on the environment. Table 3 in pages 66-68 of the document described proposed mitigation measures that will help reduce and mitigate any unavoidable impacts on existing resources. Environmental protocols to be implemented by qualified biologists prior to, during and after the construction phase of the proposed action constitute additional measures that will be taken to protect to the extent possible the flora and fauna and environmental resources found in the surroundings of the proposed project area.</p>
39	PE-035	Marcos A. Quiñones Otero	<p>This project will be impacting a very highly delicate part of the Tropical Forest in the center of the island. This project has not been designed to take into consideration the natural environmental conditions of the area, including endangered species, water bodies, water, and air quality. I am worried about the environmental impact in the short and long term, especially considering the geologic and tectonic characteristics that Puerto Rico has at this time. Also, the impacts to the plants and animals in the area that are already</p>	<p>The Reevaluation of the FEIS describes the efforts to protect all the existing environmental resources mentioned in this comment . Chapter 3, Section 3.1 and 3.2, beginning in page 18 of the document, evaluates and discusses all the existing important environmental resources identified within the proximity of the project area, the potential impacts to them resulting from the construction and operation of the proposed action and mitigation measures that will be taken when impacts to some resources are unavoidable.</p>

			being affected by invasive and exotic species.	
40	PE-036	Indira Medina	Is it necessary? Is its cost aimed at improvement or substantially directed towards contractors? Were neighbors, flora, and fauna considered?	On pages 14 and 15 information regarding the need for this project has been provided. Due to the topographic characteristics of the area and the environmental resources surrounding the project, the design includes many structural components to reduce and mitigate the extent of the required earthworks activities during the construction phase of the project. The project has the support of the citizens of the region that have been waiting for its construction for decades. This project is included in the infrastructure of the Land Use Plans of the Municipalities of Adjuntas and Utuado. They are looking forward to the completion of its construction as a measure to improve and reduce the response times for the deployment of their crews in the aftermath of a natural disaster or during an emergency event. The proposed mitigation measures help to reduce the extent of the construction activities, which is another factor impacting the project cost.
41	PE-037	Juan Jimenez	That road will be an environmental disaster. Millions of dollars in just 4 miles. It will destroy vegetation, create huge erosion, and affect springs and local creeks. Potential flooding against Utuado and Arecibo. Instead, I recommend expanding and improving the actual 123 road with a	The environmental studies performed along the path of the proposed project corridor indicate that the proposed action will not have a significant impact on the existing environmental resources and that the proposed mitigation measures to be adopted during the construction of the project will aid in reducing those impacts. Additional information on Mitigation Measures can be found at Table 3, pages 71-73 of the document. Hydrological-Hydraulic studies indicate that the construction complies with existing regulations regarding Floodplain

			smaller budget and solving the problem.	Management (see page 33 of the document). An explanation of why the reconstruction of PR-123 is not a viable alternative can be found in pages 14-15 of the document.
42	PE-038	Elliot M. Sosa	Greetings. As a resident of Utuado, there is not much information about this project and the environmental impacts to the natural resources along the corridor of the construction. Major concerns about the water resources and how it will impact the sediment loads into Lago Dos Bocas. Also, what will be the impact of low flow during dry months.	Adequate stormwater drainage structures and mitigation measures will be taken to comply with state and federal regulations, including CES Plan required by DNER, and a Storm Water Pollution Plan required by EPA. See table 3, pages 71-73 for additional information. A monitoring plan will be implemented before, during and after construction of the project to monitor water quality of these two water bodies and prevent any negative effect by the proposed action.
43	PE-039	Enitza Torres	This segment of PR-10 only reduces travel time by 5 to 7 minutes. This stretch represents a significant environmental impact on our area and natural resources. More extensive and in-depth studies should be conducted regarding this impact to ensure the protection of our flora and fauna.	Close coordination with state and federal agencies with direct jurisdiction on this matter has been carried out since 2002 regarding this segment of PR-10 that has not been constructed. Mitigation measures explained in the document in Table 3, pages 71-73, as well as protocols to be implemented prior to, during and after construction to protect the important natural resources within the project area.
44	PE-040	Efrain Matos Pagan	With the great amount of damaged roads all over the municipality of Utuado, it is my understanding that the main focus should be to repair the current damages and	Reconstruction efforts have been planned for existing PR-123. Pages 13-14 describe the need for the proposed action and why the reconstruction existing PR-123 is a viable solution for the needs of the citizens in this region and the need to enhance our island wide transportation system to handle

			<p>stop this process. The government has not been able to justify this construction. No data available can prove that this construction will improve traffic between Utuado and Adjuntas. The only impact I see here will be the destruction of natural resources.</p>	<p>future emergencies. Studies carried out by PRHTA and the Municipalities of Utuado and Adjuntas clearly indicate the economic benefits of the project. Table 3 on pages 66-68 describes the Mitigation Measures that will be taken to reduce impacts of the proposed action.</p>
45	PE-041	Blas Rosado	<p>The completion of this segment jeopardizes our natural resources and represents an adverse environmental impact. Therefore, we are against it until comprehensive studies and public consultations are conducted.</p>	<p>Close coordination with state and federal agencies with direct jurisdiction on this matter has been carried out since 2002 regarding this segment of PR-10 that has not been constructed. Mitigation measures explained in the document in Table 3, pages 71-73, as well as protocols to be implemented prior to, during and after construction to protect the important natural resources within the project area.</p>
46	PE-042	Felix J. Rivera Velez	<p>Why is something so serious as a federal project being demanded to be done today, July 24th?</p>	<p>The dateline for receiving comments was based on a thirty-day period that began when the Public Notice was published. The document was made available to the public for its review and evaluation and a Public Notice requesting comments was published in local newspapers.</p>