

**ATTACHMENT 30**  
**TABLE SUMMARIZING THE RECEIVED COMMENTS**  
**AND RESPONSES**

ID	Commenter	Comment	Response to Comment
1	Private Citizen	Priority should be given to this project, which will help the town's economic development.	The agency appreciates your interest in the project!
2	Private Citizen	This stretch of road is absolutely necessary to connect the south with the north, since road #10 is completely obsolete and very unsafe for users.	The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
3	Private Citizen	I work as a Sales Executive throughout the island and I think it is only fair to resolve and build this important road. I do not know, and I understand that many will think, what has caused so much waiting for the construction of this road. I understand that it is beneficial for so many people and that it can be a well planned project and that it can be built in the future.	The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
4	Private Citizen	Puerto Rico, despite being a small island, has one of the highest road construction jurisdictions. The conservation of the environment prevails to guarantee the physical and emotional health of its inhabitants. Therefore, I understand that more construction is an attempt against the well being of the people. Why don't we improve the quality of existing roads and thus make them accessible to users. Thank you for your attention.	The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, the EA establishes that the proposed action would serve to improve the resiliency of the roadway infrastructure of the Island, in particular in the aftermath of a natural disaster. As a result of its construction, a faster and efficient response may be provided to affected

			communities. The agency appreciates your interest in the project!
5	Private Citizen	<p>"As a long-term resident between Adjuntas, Ponce and Jayuya, I have witnessed the continuous effort to improve access in our region with the highway that crosses from north to south of Puerto Rico. I am more than in agreement with the completion of the section from Utuado to Adjuntas, as it represents significant progress for our communities. Not only will it facilitate transportation and connectivity, but it will also boost the local economy by attracting tourism and improving efficiency in the movement of goods and services.</p> <p>Progress does not mean sacrificing our beautiful island; on the contrary, it is an opportunity to demonstrate how development can coexist with respect for the environment. I hope that on this occasion, the necessary measures will be taken to minimize the environmental impact, such as the consideration of tunnels instead of the destruction of mountains, whenever possible.</p> <p>The early inauguration of this road will not only benefit current residents, but will also leave a legacy for future generations, showing the world the beauty of Puerto Rico and our commitment to responsible progress. I look forward to seeing this work completed and capturing its splendor in photographs that highlight how beautiful our home is!" Militza Príncipe Miró - citizen."</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address provided for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need.</p> <p>The agency appreciates your interest in the project!</p>
6	Private Citizen	Please continue with the construction of Highway 10.	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need.</p>

7	Private Citizen	<p>That it be repaired completely as long as everything is in law as well as all the roads in the country that are missing and eliminate the tolls that do not make up anything to the country since their original function could never be observed nor executed as they were planned in the beginning. many irresponsible in the system and lack of professional initiative and leadership.</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action were received. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. I shall be clarified that the proposed action does not considers the construction and operation of Toll Plazas and that the PRHTA is currently executing an Island wide highways repair program. The agency appreciates your interest in the project!</p>
8	Private Citizen	<p>"Greetings We would like to join the demand to finish the Adjuntas to Utuado PR10 route, so necessary to unite the north and south of PR. Forward with the work!!! Thank you"</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address provided for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>
9	Private Citizen	<p>It would be excellent and of great benefit to PR. Especially for those who currently have to cross the island daily.</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>
10	Private Citizen	<p>We would like the prompt completion of this road PR123 because of the need of this road to travel to Arecibo and also the completion of No.2 from Ponce on Carr Maramaya to Adjunta.</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid</p>

			<p>consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>
11	Private Citizen	<p>I do not agree with the construction of this road since there is not so much traffic on this route that money can be used to fix the existing roads.</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After assessing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, it should be indicated that the purpose and need of the project also establishes that the purpose of the proposed action is to establish a second north to south corridor that will improve the resiliency of the Island in the aftermath of a natural disaster (earthquake, storm, etc.). Also, as indicated in the EA the current section of PR-123 that would be replaced with the new PR-10 is operating at substandard and unsafe conditions. The EA provides information pertaining to the operation of current PR-123, which is seriously impaired by the landslides after storm events. This condition seriously impacts the quality of life of the residents of the area. The agency appreciates your interest in the project!</p>
12	Private Citizen	<p>Many roads and roads that connect to the countryside neighborhoods should be restored and/or modified.</p>	<p>The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After assessing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. However, the EA establishes that the proposed project would serve to improve the resiliency of the roadway infrastructure of the Island, in particular in the aftermath of a natural disasters (hurricanes, earthquakes, etc.). As a result of its construction, a faster and efficient response may be</p>

			provided to affected communities. This implies that existing communities located near the proposed action corridor will be also benefited by a safer route. The agency appreciates your interest in the project!
13	Private Citizen	It would be excellent!	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
14	Private Citizen	I agree that the Utuado/Adjunta section should be finished, I travel a lot to Ponce and that old road is not safe.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
15	Private Citizen	We are on the right track!!!!	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
16	Private Citizen	Please conduct an aggressive campaign to show the country that these funds have been used as they arrive in dribs and drabs since 2018. Dalmau is telling the TV press	Your comments will be taken in consideration during the review of the environmental document. The agency appreciate your interest in the project!

		that this is not the case. Anyway they are the ones who never start and intend to destroy the infrastructure work in pr.	
17	Private Citizen	<p>In the mountains, roads should be made using tunnels and not by destroying and lowering the mountains.</p> <p>The engineers of this country should visit Europe where highways and tunnels for trains are made and they do not destroy or disfigure as much as in Puerto Rico.</p>	<p>The PRHTA acknowledge receipt of the comment that you submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After assessing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, it should be indicated that the purpose and need of the project also establishes that the purpose of the proposed action is to establish a second north to south corridor that will improve the resiliency of the Island in the aftermath of a natural disaster (earthquake, storm, etc.). Also, as indicated in the EA the current section of PR-123 that would be replaced with the new PR-10 is operating at substandard and unsafe conditions. The EA provides information pertaining to the operation of current PR-123, which is seriously impaired by the landslides after storm events. This condition seriously impacts the quality of life of the residents of the area. The agency appreciates your interest in the project!</p>
18	Private Citizen	<p>I understand that it is necessary to finish Highway 10 from Arecibo to Ponce, that would help communication from North to South of the island, being the second alternative after the Luis A. Ferré Express. In addition, it would benefit the island's interstate commerce, shortening distances; It would also be beneficial for students, workers and tourists alike. In the event of a health emergency it would be closer to the country's main hospitals. In short, it would be a work that we would have to finish, since this express has not been finished for more than 20 years, whenever a governor wins he promises to finish Highway Number 10 and time continues to pass, I think it is time for them to finish it. that they started, for the benefit of all, even if we have to pay a toll.</p>	<p>The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>

19	Private Citizen	It is much needed for those of us who travel to Asia, the south is a closer route	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
20	Private Citizen	This highway is of utmost importance for economic development in the mountain area but also in the south and north of the island and would provide medical service, airport, port of the Americas and the food chain in just 25 minutes from the towns in the center of PR. vital for the entire island. "Let it begin now"	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
21	Private Citizen	I want the completion of the road to be completed as soon as possible due to the inconveniences on Highway 123 of Utuado, including many traffic problems, many curves, landslides, and difficult traffic.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
22	Private Citizen	This highway is very important for the health and safety and economic growth of this town.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it



			does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
23	Private Citizen	This section is of utmost importance for people who live in Utuado, Adjuntas and neighboring towns because tourism will increase along with the economy. We will have faster and safer access.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
24	Private Citizen	Greater accessibility for Adjuntas residents.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
25	Private Citizen	This section urgently needs to be completed to activate the economy of the center of the island, and for the use and enjoyment of tourism and all Puerto Ricans.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
26	Private Citizen	A construction with the correct codes can be done for people who have to travel to work or medical appointments in the South	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the

		area. For us residents of the area it is extremely important.	proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
27	Private Citizen	It would be easy to access to surrounding towns.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
28	Private Citizen	That the section of the 10 is being built, from utuado to adjoined, it is greatly needed	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
29	Private Citizen	Yes, I accept that the section of Highway 10 from Utuado to Adjuntas will be built.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the

			proposed action need. The agency appreciates your interest in the project!
30	Private Citizen	I am in favor of building Highway 10 from Utuado to Adjuntas, Thank you so much...	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
31	Private Citizen	We need that express to have better access	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
32	Private Citizen	This highway will provide economic and social development to our municipality. I agree with the construction of it.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
33	Private Citizen	In favor of construction of section PR 10 to Adjuntas. It would greatly help our people. Making way for new businesses, etc.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid

			<p>consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>
34	Municipality of Utuado	<p>The PR-10 Extension project between the Municipalities of Utuado and Adjuntas represents an alternative for the movement of goods and services between the north and the south, shortening the distance between the municipalities in the center of the Island.</p> <p>The road runs between the municipalities of Arecibo, Utuado, Adjuntas and Ponce and currently the highway has been 86% completed, with only four (4) sections remaining with a total of 7.6 kilometers for completion.</p> <p>Once the construction of these sections is completed, it will be possible to travel from Arecibo to Ponce in an efficient and safe manner, in accordance with the original planning of the project.</p> <p>After reviewing the Environmental Assessment document and its technical appendices that were published in the Primera Hora newspaper on March 19, 2024, we inform you that we favorably endorse it.</p> <p>We are at your service for any necessary management with the Municipality.</p>	<p>The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>
35	Municipality of Adjuntas	<p>The PR-10 Extension project between the Municipalities of Utuado and Adjuntas represents an alternative for the movement of goods and services between the north and the south, shortening the distance between the municipalities in the center of the Island.</p> <p>The road runs between the municipalities of Arecibo, Utuado, Adjuntas and Ponce and currently the highway has been 86% completed, with only four (4) sections remaining with a total of 7.6 kilometers for completion.</p> <p>Once the construction of these sections is completed, it will be possible to travel from Arecibo to Ponce in an efficient and</p>	<p>The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>

		<p>safe manner, in accordance with the original planning of the project.</p> <p>After reviewing the Environmental Assessment document and its technical appendices that were published in the Primera Hora newspaper on March 19, 2024, we inform you that we favorably endorse it.</p> <p>We are at your service for any necessary management with the Municipality.</p>	
36	Private Citizen	<p>The PR10 has become one of the main roads in the country, crossing from south to north and vice versa. It is of utmost importance that the missing section be completed in order to have a much safer road for all the pedestrians who use it daily.</p>	<p>The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>
37	Municipality of Ponce	<p>The PR-10 Extension project between the Municipalities of Utuado and Adjuntas represents an alternative for the movement of goods and services between the north and the south, shortening the distance between the municipalities in the center of the Island.</p> <p>The road runs between the municipalities of Arecibo, Utuado, Adjuntas and Ponce and currently the highway has been 86% completed, with only four (4) sections remaining with a total of 7.6 kilometers for completion.</p> <p>Once the construction of these sections is completed, it will be possible to travel from Arecibo to Ponce in an efficient and safe manner, in accordance with the original planning of the project.</p> <p>After reviewing the Environmental Assessment document and its technical appendices that were published in the Primera Hora newspaper on March 19, 2024, we inform you that we favorably endorse it.</p> <p>We are at your service for any necessary management with the Municipality.</p>	<p>The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, your comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!</p>

38	Private Citizen	It is extremely important that this project be carried out because it is too unsafe to travel on that road, especially when it rains. There are so many accidents and collapses. The environmental impact is less than taking into consideration the safety of those who travel daily for medical appointments, work, etc. Thank you	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
39	Private Citizen	For me it is important to have safe access from Utuado to Ponce to make purchases for the business and receive new clients from the southern towns.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
40	Private Citizen	This project is one of great importance for the town. Road 123 is very dangerous at night due to lack of lighting and when it rains it is slippery.	The PRHTA acknowledge receipt of the comment submitted through the email address for the Environmental Assessment (EA) prepared for the proposed action. The agency assessed it with respect to its relevance to provide an objective and valid consideration for the improvement and understanding of the circulated environmental document. After reviewing its relevance with respect to the discussions already provided in the document, it has been determined that it does not change the conclusions of the circulated environmental document and its technical appendices. However, you comment certainly provides support to the proposed action need. The agency appreciates your interest in the project!
41	EPA - Mark Austin, Manager Environmental Reviews and Strategic Programs Section	<p>A.</p> <p>Proposed Action and Scope of Analysis: The Council on Environmental Quality's (CEQ) National Environmental Policy Act (NEPA) regulations at 40 CFR § 1501.5(c)(1) state that an EA shall: "[B]riefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement</p>	<p>A.</p> <p>Response: Over time, the Puerto Rico Highways and Transportation Authority (PRHTA) has consistently evaluated and monitored environmental conditions. Collaborating closely with both state and federal agencies, the PRHTA has diligently updated its environmental review to ensure the accuracy of its findings. The Environmental Assessment (EA) comprehensively reviewed these efforts, examining</p>

or finding of no significant impact...”. As currently presented, the EA appears to lack contemporary up-to-date information and studies to support conclusions about the potential impacts to resources. As substantial changes in the baseline environmental conditions may have occurred since the original issuance of the Final Environmental Impact Statement (FEIS), it is unclear to what extent the findings of the 1979 FEIS are still applicable. In conducting a re-evaluation, we recommend the EA rely on the most recent information reflective of the best available science.

**B.**

**Proposed Action and Scope of Analysis:** The EA should also identify the current and projected future state of the affected environment without the proposed action (i.e., the no action alternative), which serves as the baseline for considering the effects of the project and its reasonable alternatives. Such an analysis should consider potential climate impacts to the affected environment using the best available climate change information considering potential future emissions scenarios.

compliance with 14 federal environmental laws and at least nine other environmental factors relevant to the proposed action. Soil studies, hydraulic studies, traffic studies, and noise and air quality assessments were conducted and approved by DNRE, with findings documented in various attachments.

Updates were also made to studies regarding impacts on farmlands, floodplains, wetlands, environmental justice requirements, and hazardous sites near the area, as detailed in their respective attachments.

The EA documents the current conditions of the project corridor and its adjacent areas, assessing all potential impacts. Findings indicate minimal changes in land use and infrastructure developments within the corridor since the last environmental re-evaluation. This stability is primarily due to the geographical location of the proposed action in the central part of the island, within the Cordillera Central. This mountainous region has a low population density and is composed mainly of undeveloped lands with steep topography.

Development restrictions outlined in the Puerto Rico Planning Board’s 2015 Land Use Plan, the 2023 Utuado Territorial Land Use Plan, and the 2011 Municipality of Adjuntas Land Use Plan, with input from residents, have been instrumental in preserving the area's integrity. Consequently, the conclusions drawn in the Final Environmental Impact Statement (FEIS) remain valid, as supported by successive environmental re-evaluations and the recently completed Environmental Assessment (EA).

**B.**

**Response:** The Environmental Assessment (EA) offers insights into the prevailing conditions of the affected environment, as discernible from various sections:

**1. Section 5.1 Compliance with Regulatory Frameworks**  
This section furnishes details regarding the present environmental status along the project corridor, covering aspects such as coastal barrier zones, floodplain areas, air quality, noise, endangered species, farmlands, historic and archaeological resources, aquifers, wetlands and Wild Scenic Rivers.

**2. Section 5.2 Environmental Assessment Factors**  
This section assesses Land Development, Socioeconomic conditions, Community Facilities and Service and Natural Features that incorporates recent insights in Climate Change and Hurricanes.

It's pertinent to note that the content of the EA concerning the description of the affected area aligns with FHWA and HUD requirements and is supplemented with additional FHWA considerations such as noise and air quality descriptions. This content is a result of comprehensive database reviews from various sources:

- United States Fish and Wildlife Service (USFWS) ECHO system
- Puerto Rico Planning Board (PRPB) databases for critical habitat locations, natural reserves, forests, zoning maps, transportation plans, etc.
- Air quality data obtained from EPA/DRNA
- Recent consultations with agencies specializing in endangered/critical species management such as DNER/USFWS
- Review of recent online database reports on the effects of Hurricanes María and Fiona on the island's flora, including those published by the US Forest Service

Furthermore, the anticipated future state of the environment is also outlined in these studies, incorporating estimates of proposed impacts across analyzed categories. Examples include air quality, noise levels, wetlands, wildlife, and vegetation, with corresponding mitigation measures identified. This comprehensive analysis of both current and future conditions enables the incorporation of mitigation measures for climate change and hurricane impacts as part of environmental commitments.

Traffic studies that estimated both current and future traffic increases were conducted, including estimates of Vehicle Miles Traveled (VMT), for the proposed action. Socioeconomic studies were also reviewed to assess potential future scenarios in the region. Considering the anticipated decrease in population and corresponding economic activity, a minimal traffic increase over the next 20 to 25 years was projected. With average daily traffic expected to remain below 10,000 vehicles per day in both 2025 and 2045, only a qualitative assessment based on current air quality guidelines was conducted.

If the proposed action is not constructed current conditions and trends in the corridor described in the EA will persist, leading to increasingly inefficient transportation linkages and associated losses in population, employment, and economic development opportunities.



	<p>C. Alternative Analysis: The EA evaluates three potential alternatives, two of which were dismissed as they did not address the purpose and need of the proposed action. As such, the alternatives analysis was limited in that it evaluated alternatives that were considered nonviable. Additionally, the feasible</p>	<p>Among the supporting documents for these statements are the Traffic Study prepared by Steer Davies, Land Use Plans of the Puerto Rico Planning Board, traffic accident data used in the Benefit/Cost Study, Geotechnical Studies of the Project and The Transportation Intermodal Plans for 2050.</p> <p>A lack of a resilient North-South corridor will perpetuate:</p> <ul style="list-style-type: none"> <li>• Project safety concerns.</li> <li>• Inadequate system linkage and connectivity between the southern and northern parts of the island.</li> <li>• Increased travel delays and traffic accidents. *Please see note below</li> <li>• Delayed emergency response to communities in the area.</li> <li>• Deterioration in the quality of life for residents along PR-123 will continue.</li> <li>• Landslides on PR-123 during heavy rainfall or hurricanes.</li> <li>• Adverse impacts on water resources and drainage.</li> <li>• Negative effects on noise and air quality for residences adjacent to PR-123.</li> <li>• Public expectations will not be met.</li> <li>• The relative market areas for employment, communities, and destinations will shrink due to increasing travel inefficiencies.</li> <li>• The beneficial transportation-land use relationship established by municipalities, and regional planning activities in the corridor will be diminished or rendered ineffective.</li> <li>• Commerce and the movement of goods and services will suffer, decreasing the economic competitiveness of the region.</li> </ul> <p>* The traffic study prepared by Steer Davies establishes that there will be an increase of traffic in the future at the rate of 1 to 1.5% for the next 20 years after the proposed action is constructed. Truck traffic is also expected to increase as this roadway has one of the highest percentages of truck traffic within the region as indicated in the Transportation Intermodal Plan for 2050.</p> <p>C. Response: The inclusion of the No Action and the modification alternative for the existing PR-123 route was driven by continued support from various stakeholders, despite the fact that these options do not adequately address the region's transportation needs. The document acknowledges consideration of other transportation modes as alternatives. However, due to topographical and natural constraints, no other</p>
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alternative propagated throughout this EA remains located within the same corridor of those alternatives analyzed for the original FEIS. EPA recommends that the EA include meaningful consideration and analysis of additional alternatives, including those outside of the corridor of those analyzed within the original FEIS that may meet the purpose and need.

meaningful or viable alternatives exist within the boundaries of the current constructed portion of PR-10.

The Puerto Rico Highway and Transportation Authority (PRHTA) has meticulously studied and refined proposed actions as necessary and justified. The project corridor has remained open for comments and recommendations from state, federal, and municipal entities, as well as interested private organizations and the general public, facilitated by the Metropolitan Planning Organization (MPO). The PRHTA has coordinated this project through the MPO and concerned municipalities. The proposed project is part of their municipal plans and many economic development strategies, such as the promotion of tourism and agricultural activity, rely on the construction of the proposed action. Ongoing coordination with municipalities and their citizens has been conducted through their respective land use planning offices.

The preparation and administration of Territorial Plans rely on the participation of the citizens within each municipality. This participation is conducted through the municipal planning offices. PRHTA has maintained close coordination with the Municipalities of Ponce, Utuado and Adjuntas regarding this project. The MPO has also received feedback from mayors and representatives of these municipalities in meetings held to discuss the transportation plans of this region. Public hearings have been held in compliance with federal regulations that provide public participation in the planning process. PR-10 has been identified as a project of high priority by MPO's Transportation Plan.

All reasonable and feasible alternatives have been rigorously explored, objectively evaluated, and discussed in the Final Environmental Impact Statement (FEIS) for PR-10 (Chapter IV) and subsequent re-evaluations. The proposed action is included in the Multimodal Long Range Transportation Plan for 2050 and is subject to continuous evaluation and feedback from agencies, municipalities, and the public alongside other transportation systems in the North Region.

The MPO has divided the Island into several regions with regards to transportation plans. The proposed action is part of the North regions of metropolitan areas with populations less than 200,000 inhabitants. All comments and recommendations regarding these projects are

coordinated through officials who manage the North Region.

A Route Location Study and Reconnaissance Report completed in 1969 identified three corridor alignments included in the Draft FEIS for PR-10. In the early 2000s, a section of the PR-10 project beginning at its intersection with PR-603 and ending at station 64+00, near the municipality limits of Utuado and Adjuntas, was shifted further east using the alignment of Alternative 2A of the FEIS. During this process, alignments east of the Rio Grande de Arecibo River were evaluated but deemed unsuitable due to increased costs, environmental issues, and impacts on communities along the existing PR-123. In 2007, the Puerto Rico Highway and Transportation Authority (PRHTA) requested proposals (RFP) from three Transportation Consulting firms for the evaluation of Alternatives and Design of the proposed highway PR-10 Utuado – Adjuntas segment. The firm Barrett Hale and Alamo LLC presented the alternative with the lowest environmental impact with an alignment parallel to the Rio Grande de Arecibo and bridges over most of existing creeks and streams along the recommended alternative. During the design process the proposed alignment and profile grade were optimized and bridges were added to the rest of the existing creeks and streams including berms and soil nails as a measure to prevent landslides of the embankments and cut areas respectively.

The area's geography, characterized by rugged, steep, and elevated mountains, along with the existing constraints of having to interconnect the already constructed portions of PR-10 north and south of the proposed action site, limit the possibility of exploring alternative alignments or studying another corridor.

Despite these constraints, alternative upgrades to PR-123 have been continuously studied. These studies have shown that such alternatives would result in significantly higher costs and greater environmental impacts on communities and existing resources compared to the preferred alternative.

D.  
Alternatives Analysis:  
Further, the environmental impacts associated with each alternative should be clearly presented in a comparative form to provide a clear basis for selection. Impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of

D.  
Response: A table as recommended will be prepared and included in the FONSI.

wetlands impacted; changes to water quality standards, etc.).

E.

**Air Quality Impacts:**

Page 40 of the EA states, "For transportation related projects, the pollutant of concern is CO, which is associated with the operation of combustion engine vehicles."

Transportation sources are responsible for a range of other pollutants of concern, including fine particulate matter, nitrogen oxides, volatile organic compounds, air toxics and greenhouse gases. Even where regional air quality meets ambient air quality standards, people who live, work or attend school near major roads may face an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. These potential impacts should be addressed and disclosed in the EA.

E.

Response: The air quality analysis adhered to established procedures for assessing the environmental impacts associated with highway construction. See FHWA Technical Advisory 6640.A (1986) and FHWA Environmental Website. Data was gathered from the former Environmental Quality Board, now integrated into the Department of Natural and Environmental Resources, as well as from private entities monitoring air quality parameters in relevant municipalities. Additionally, Environmental Justice Screen data, which outlines 12 environmental indicators, was thoroughly reviewed and analyzed (See Attachment 21).

The proposed action begins, at its northern boundary, in the Guaonico Ward of the Municipality of Utuado, at its intersection with existing PR-10. It then proceeds through the Guaonico Ward in a southwestern direction, following parallel to the path of the Rio Grande de Arecibo. Continuing southward, it passes through the Capaéz Ward in the Municipality of Adjuntas, west of the Rio Grande de Arecibo, until reaching its intersection with existing PR-10 north of the urban center of the Municipality of Adjuntas. Both wards primarily consist of sparsely populated rural areas. The corridor navigates mountainous terrain, acting as a natural barrier between the roadway and adjacent communities to the west. To the east, the highway's elevation is higher, and it maintains a considerable distance from residents along PR-123.

Currently, residents in the Guaonico Ward are not exposed to air quality impacts from roadways, while those along PR-123 and its surroundings experience minimal exposure. Following the project's completion, a significant reduction in traffic on PR-123 (approximately 80%) is expected, thereby mitigating potential air quality impacts. Given the proposed highway's elevation profile, favorable meteorological conditions, especially prevailing winds aiding gas emission dispersion, and the presence of mountainous terrain separating communities, an increase in air quality impacts is not anticipated. A similar situation is observed in the Capaéz Ward of Adjuntas Municipality, where communities closer to the corridor are shielded from the highway by mountains and vegetation. Communities adjacent to PR-123 are further away from the proposed project and will benefit from existing vegetation and topography providing additional

shielding.

The surrounding areas of the corridor are characterized by dense vegetation, which aids in absorbing emitted pollutants. On average, these areas have the ability to absorb approximately 2.5 metric tons of CO2 per acre annually. Additionally, they can reduce concentrations of Particulate Matter (PM) by 7-24%, remove approximately 5-15% of NO2 and SO2, and eliminate 1-15% of ozone from the atmosphere. They also play a crucial role in absorbing volatile organic compounds (VOCs).

F.

Response: The suggested link has been added to the EA document on the reference page.

G.

Response: The Clean Air Act requires a general plan to achieve the NAAQS in all areas of the country and a specific plan for each nonattainment. Federal air quality regulations include a transportation conformity rule and a general conformity rule. Federal Highway Administration (FHWA) requires that transportation plans, programs, and projects conform to State Implementation Plan (SIP) goals. The conformity determination was based on this requirement and the qualitative air quality analysis conducted for this project.

H.

Response: Section 5.3 of the document describes the mitigation measures to be implemented during the construction of the project. The above-mentioned recommendations have been added to this section and will be included in the construction contracts for this project.

F.

Air Quality Impacts:  
Page 40 references a review of EPA's Green Book to check for non-attainment status. This is appropriate - and the conclusion that Adjuntas and Utuado is not classified as non-attainment or maintenance is correct - however the link provided shows just one criteria pollutant standard (2010 SO2 designations). The status for all pollutants and standards can be found here:

<https://www3.epa.gov/airquality/greenbook/anc13.html>.

G.

Air Quality Impacts:  
Page 41 references conformity with the State Implementation Plan (SIP). As the project is located in an area not classified as non-attainment or maintenance, there is no applicable SIP.

H.

Air Quality Impacts:  
The construction impacts listed include fugitive dust and combustion gases by heavy equipment and trucks. Heavy-duty vehicles also produce fine particulate matter emissions during combustion, which can pose health concerns. EPA recommends the project sponsors consider measures to control these particulates as well as combustion gases may include

policies to limit unnecessary idling and the use of the cleanest engines available to the extent feasible.

I.

Air Quality Impacts:

EPA recommends that the EA quantify the potential greenhouse gas (GHG) emissions associated with the project, including upstream emissions associated with materials manufacturing and those emissions due to construction of the highway. Additionally, we support estimates of the social cost of GHG emissions (SC-GHG) for each alternative to facilitate decisionmakers' and the public's evaluation of the proposed alternatives by monetizing the calculated GHG emissions. This is in alignment with CEQ's January 9, 2023 interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. This guidance was in response to EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis.

I.

Response: The FHWA requirements regarding Greenhouse Gas (GHG) emissions measures for transportation projects were established on December 7, 2023, at 23 CFR 490. Transportation efforts to reduce GHG are normally done through at least a Regional Transportation Plan and main strategies consist of clean fuel initiatives, Mass Transit Expansions, Bike and Pedestrian Path Programs as well as transition of fleets to electrical vehicles per 100 vehicles. Typically, projects with daily traffic exceeding 140,000 to 150,000 vehicles require greenhouse gas emissions scrutiny (see FHWA Technical Advisory T 6640 and FHWA Environmental Website, Air Quality). GHGs are different from other air pollutants evaluated in federal environmental reviews because impacts are not localized or regional due to their rapid dispersion into the global atmosphere. Therefore, it is difficult to isolate and understand the GHG emissions impacts for a particular transportation project given there is no scientific methodology for attributing specific climatological changes to that transportation project's emissions. It has been concluded, based on the nature of GHG emissions and the exceedingly small potential for GHG impacts from the proposed action, that the GHG emissions from the proposed action will not exert a meaningful role in a determination of an environmentally preferable alternative or the selection of the preferred alternative. No alternatives-level GHG analysis has been performed for this project since GHG emissions are very small in the context of the affected environment.

For projects with low traffic volumes, a qualitative analysis is sufficient. Given the anticipated traffic flow of approximately 5,000 vehicles per day and projections indicating a modest 1 to 1.5% annual growth in traffic from 2025 to 2045 amidst a forecasted economic slowdown in the region, the expected environmental impacts of the proposed action are not significant, showing little variation among alternative scenarios. This conclusion is supported by trends in vehicle emissions, showcasing significant reductions resulting from stringent EPA regulations governing the manufacture of engines and production of fuels. Additionally, the corridor contains extensive forested areas capable of mitigating anticipated highway emissions by absorbing Carbon Monoxide. Sensitive receptors such as schools, childcare centers, elderly housing complexes, and

J.  
 Water Resources/Wetlands Impacts:  
 • Impacts to wetlands during the construction of stream crossings along the proposed route have been minimized by the implementation of an 8-step decision-making process implemented by the FHWA and the U.S. Department of Housing and Urban Development during the evaluation of alternatives and the design of the project, in adherence to 24 CFR 55.20 and Executive Order No. 11990 for the protection of wetlands.  
 o The only impacts to wetland areas are associated to the construction of a new bridge crossing Rio Grande de Arecibo in the Utuado-Adjuntas segment of the project. The construction of this crossing will require the placement of rip-rap along both sides of the stream to protect the bridge from erosion. Approximately 383.5 cubic yards of concrete, 1,160 cubic yards of rip-rap and 535.5 cubic yards of clean fill material will be discharged within the ordinary high-water mark. The permanent impacts have been estimated as 0.35 acres. The Puerto Rico Highway and Transportation Authority (PRHTA) has obtained a U.S. Army Corps of Engineers (USACE) permit authorizing these impacts under Nationwide Permit No. 14 (Linear Transportation Projects). Such permit (No. SAJ-2021-01874) is valid until March 14, 2026. EPA agrees with the USACE's determination to issue a permit, provided adherence to the conditions specified under NW-14, as well as to the project specific special conditions specified under permit

healthcare facilities are notably absent from the proposed corridor, minimizing potential exposure risks. An analysis performed concluded that Environmental Justice (EJ) residents near the proposed route would not be adversely affected by vehicles emissions as environmental assessments have not identified air quality concerns within the vicinity.

Considering the aforementioned factors, it can be reasonably concluded that the EA adequately evaluates the Greenhouse Impacts associated with the proposed action, warranting no need of 3. further detailed study.

J.  
 Response: Consideration for the urgency and necessity of safeguarding water quality resources has been clearly outlined in the following sections:  
 1. Section on Soil Suitability/Erosion/Drainage/Storm Water Runoff (page 66), which emphasizes the need for a Stormwater Pollution Prevention Plan (SWPPP) to implement site-specific Best Management Practices (BMPs) as mandated by the EPA Construction General Permit (CGP). This involves protecting wetlands and streams adjacent to the project construction areas.  
 2. Section 5.2.4 of the Environmental Assessment (EA) titled Unique Natural Features, Water Resources (page 78). This section provides support to the statement that there are not unique natural features that would be impacted by the proposed action and that the DNER issued a letter (included in Attachment 11 of the EA) stating that no impact from the proposed action to the water resources or other natural resources within surrounding areas are expected based on the review of the submitted information.  
 Considering all the crossings over small creeks and natural drainage ditches, including the 0.35 acres of Section II identified in the USACE permit for the water body as a permanent impact, the estimated impacts primarily temporary in nature are approximately 4.0 acres. This estimation is based on available construction drawings, reflecting the rugged topography and hydrological conditions of the area. Notably, wetland maps obtained from the National Wetland Inventory Maps published by the USFWS indicate no extensive wetland systems associated with these aquatic resources. These small creeks and natural drainage ditches are tributaries of the Rio Grande de Arecibo, the most significant aquatic resource in the area.  
 3. Table 4, included in Section 5.3 Control Monitoring, Mitigation, and Environmental Commitments (page 92),

SAJ-2021-01874. EPA Urges the PRHTA to protect the water quality at Rio Grande de Arecibo and other stream crossings through the installation of appropriate erosion and sedimentation control measures during construction.

K.

Water Resources/Wetlands Impacts:

- EPA urges the PRHTA and FHWA to provide detailed plans and specifications to contractors and to clearly mark any nearby wetlands near construction areas to minimize the potential for incidental impacts from construction and staging areas which may result in enforcement actions under Section 404 of the Clean Water Act.

L.

Water Resources/Wetlands Impacts:

- In discussing impacts to aquatic resources and wetlands, the EA does not distinguish between short-term and long-term impacts, such as within the context of time needed to re-establish vegetation or restore

outlines the PRHTA/FWHA requirements for the contractor regarding the protection of water resources.

K.

Response: As outlined in the Environmental Assessment (EA), the project needs to obtain permits from the United States Army Corps of Engineers (USACE) for all jurisdictional areas along the proposed project route for its construction. A review of the figures in Attachment 15 displays the locations of these wetlands, as identified in the National Wetland Inventory by the US Fish and Wildlife Service (USFWS). Apart from the Rio Grande de Arecibo crossing, these wetlands generally occupy small areas. To mitigate direct impacts from the project's construction activities, the Puerto Rico Highway and Transportation Authority (PRHTA) will require to incorporate structures that circumvent these wetlands. Evidence of this design approach is reflected in the USACE permit already obtained for Section II of the project. Per EPA's directive, the USACE imposes permit conditions aimed at safeguarding jurisdictional areas, encompassing both wetlands and bodies of water. Additionally, the EA specifies in the Soil Suitability/Erosion/Drainage/Storm Water Runoff section (page 66) the requirement to develop a Stormwater Pollution Prevention Plan (SWPPP) in accordance with EPA regulations outlined in 40 CFR Part 122. These regulations apply to construction projects where earthwork activities exceed one (1) acre. The SWPPP development entails identifying wetlands and bodies of water potentially affected by construction activities and devising suitable Best Management Practices (BMPs) for their protection. Moreover, notwithstanding the aforementioned measures, the PRHTA will furnish contractors with detailed plans and specifications to identify wetlands near construction areas. This proactive step aims to minimize the risk of incidental impacts from construction activities and staging areas.

L.

Response: EPA's recommendations will be incorporated in the EA. The proposed action would have both short-term and long-term impacts on wetlands. Short-term effects will involve habitat disruption, water quality degradation, and minor hydrological changes. Long-term impacts include



potential loss of functions. These temporal considerations should be factored into an impacts determination for these resources.

M.

Water Resources/Wetlands Impacts:

- Additionally, we recommend that a monitoring plan be developed to ensure the effectiveness of best management practices implemented to protect water quality.

N.

Water Resources/Wetlands Impacts:

- In addition, the EA states that a surplus of 850,000 cubic meters of fill will need to be adequately managed or disposed of. EPA recommends that the EA include a discussion of the intended use of the fill material, including testing measures to ensure suitability of the material for reuse.

permanent habitat loss. Measures will be taken in order that the hydrology of the subbasin is not altered. No long-term effects on wetland functions of the existing water bodies crossings are expected. With the BMP's included for this project, ongoing monitoring during the construction phase and compliance with the requirements of the Corps of Engineers for the Nationwide permit, it is possible to mitigate these impacts and preserve the vital functions of wetland ecosystems in the corridor of the proposed action.

M.

Response: EPA's recommendation on this matter is noted and will be incorporated in the EA. The need for monitoring to verify the effectiveness of the best management practices has already been included in Table 4 of section 5.3 of the Environmental Assessment (EA), which is titled Control Monitoring, Mitigation, and Environmental Commitments

N.

Response: The reason why a specific final use for the surplus material is not indicated in section 5.1.6 Contamination and Toxic Substances 24 CFR § 58.5 (i) (2) and 24 CFR 51 of the Environmental Assessment (EA) is that the determination will be made when the material is generated during earthwork activities. This decision depends on other ongoing construction projects or facilities in the area that may require fill material for their completion. Consequently, the EA establishes a general statement stating that material transportation and management will adhere to applicable environmental regulations set by the Department of Natural and Environmental Resources (DNER) and the Permitting Management Office (PMO). To further clarify this subject, the PRHTA will incorporate in the proposed action contract documents the allowable and/or permitted material handling practices.

These local agencies have developed regulations governing the management of this material, which is not classified as waste. Examples of these requirements include:

- Receiving sites must possess a valid DNER/PMO permit, requiring the development and implementation of a Plan for Control of Erosion and Sedimentation (CES Plan).
- Material transportation to its destination must utilize trucks with covered loading areas to minimize dust emissions.

O.  
Water Resources/Wetlands Impacts:  
• EPA encourages the consideration and implementation of low impact development techniques, which have the potential to further reduce stormwater volumes and thus mimic natural conditions as closely as possible. The techniques also lessen impacts of stormwater runoff from impervious surfaces such as paved roads, and can provide energy and other utility savings.

• If the receiving project impacts an area exceeding one (1) acre, it must have a Stormwater Pollution Prevention Plan (SWPPP) and its corresponding Construction General Permit.  
These requirements are detailed in Table 4, included in Section 5.3 Control Monitoring, Mitigation, and Environmental Commitments (page 96) of the EA.

O.  
Response: The PRHTA acknowledges the potential benefits of low impact development techniques and will consider their adoption and implementation for the project when and where practical. However, it shall be noted that certain characteristics and conditions of the proposed action may limit the applicability of some of these techniques, particularly given its rural location and lack of utilities or energy requirements. Nonetheless, Section 5.2.4 of the EA describes similar measures that have been integrated into the project design to achieve similar goals and adapt to climate change impacts, ensuring highway construction resilience in mountainous areas. These measures include:

- Thorough site assessments and consideration of future climate projections during the design phase.
- Use of climate-resilient and durable construction materials.
- Installation of vegetation strips between the roadway and lateral swales to act as a biofilter.
- Design of stormwater runoff discharge points before or after bridges with oil/water separators.
- Implementation of slope stabilization and hazard mitigation measures.
- Construction of culverts and bridges to manage increased water flow during intense rainfall.
- Integration of eco-friendly construction practices to minimize environmental impacts.
- Measures to prevent riverbank erosion and stabilization of vegetation.
- Consideration of flood risk assessments and implementation of adequate drainage systems.
- Design and placement of bridges to accommodate potential changes in river flow and water levels.
- Implementation of erosion and sediment control measures during construction to maintain water quality.
- Efforts to minimize disturbances to aquatic habitats during construction.
- Consideration of potential bridge scour due to altered river flow patterns.

	<p>P. Environmental Justice (EJ):</p> <ul style="list-style-type: none"> <li>• The EA states that “A review of available information provides support to the statement that there are no environmental conditions identified that would have disproportionately high impact adverse effect on low-income and/or minority populations”. The EPA has concerns about the conclusions made in the EA regarding EJ impacts and recommends the EA identify, analyze, and address disproportionate impacts in accordance with Executive Order 14096, Revitalizing Our Nation’s Commitment to Environmental Justice for All and the Guidance from the Council on Environmental Quality on Environmental Justice and the National Policy Act (CEQ EJ Guidance). EO 14096 directs federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects</li> </ul>	<ul style="list-style-type: none"> <li>• Regular maintenance of bridges to prevent structural damage and ensure stability.</li> </ul> <p>These strategies will enhance the resilience of the proposed action to climate change impacts while promoting safety and sustainability of the highway infrastructure. Although using a permeable pavement may not be suitable due to the characteristics of vehicular traffic flow in the corridor, its use in lateral paved shoulders will be considered.</p> <p>Regarding recommendations for low impact development techniques, it is noted that the Green Streets Handbook primarily focuses on non-point sources in urban areas. However, upon reviewing potential sources of information applicable to this project, the handbook was assessed. It is important to highlight that the proposed action is in a rural area where impervious surfaces are less prevalent compared to urban settings. Efforts have been made to incorporate recommended practices into the project design, such as vegetated filter strips and swales using bioretention soil media and vegetation to promote infiltration, water retention, sedimentation, and pollutant removal. These measures have already been integrated into the project design to enhance environmental sustainability.</p> <p>P. Response: The EA complies with the requirements of Executive Order 14096 and Executive Order 12898. The discussion of Environmental Justice is found in Section 5.1.17 of the EA and the EJ SCREEN Report included in Attachment 21 of the EA. The alignment of the proposed action traverses through Guaonico Ward in Utuado and Capaéz Ward of Adjuntas. The population’s densities of both wards are low, having an average of 249 residents per acre. Socio-economic characteristics of the population data for the area obtained from the U.S. Census population exhibit a general trend towards a decline of its population. The Justice40 (Justice40 Initiative   Department of Energy) was also used to verify these results. A review of this data revealed the fact that based on their income, residents of the area incomes are considered within the poverty descriptor limits. There are approximately 54 households within the centerline of the proposed corridor crossing the Guaonico Ward, which have a per capita income of \$9,600. Approximately 108 households with a capital income of \$8,114.00 are located in Capaéz Ward. Due to the existing topography of the area and the gradient of the highway, the roadway corridor will only traverse near two pockets of residential</p>
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(including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns. It builds upon Executive Order 12898 Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations.

- o It is unclear how communities with EJ concerns were identified. The EA should clearly and effectively define the “reference community” and the “affected community” used in the environmental justice analysis. These definitions are used to determine whether there are disproportionate and adverse impacts by comparing the impacts to the affected community with the impacts to the reference community. A well-defined affected community will accurately reflect the demographic characteristics of the populations likely to be adversely impacted by the proposed project. A well-defined reference community will reflect the characteristics of the general population (e.g., municipal, regional, state).
- o Additionally, although the project may result in benefits to communities with EJ concerns, it is important to acknowledge that such benefits cannot be used to offset potential impacts. In assessing potential impacts to communities with EJ concern, the EA would benefit from a baseline description of current existing stressors/pollution burden within these communities to better assess potential cumulative effects.
  - Even though project impacts may be the same for all populations within the proposed project area, please note that social determinants of health, such as language and literacy skills, education, job opportunities, and income, may result in minority and low-income populations bearing a disproportionate burden of environmental health risk from project impacts. These factors of risk should be accounted for and considered in the analysis for determining if any alternative

units. At the northern side of the proposed corridor, the closest residences are located at an approximate distance of 150 meters from the proposed highway. Existing mountainous terrain and vegetation will serve to shield the majority of these residents, located adjacent to PR-123, from the proposed corridor. Regarding to the lower end of the corridor in the Municipality of Adjuntas, the corridor traverses through a mountainous area where two pockets of residences are located approximately 135 and 100 meters from the future highway, respectively. Further review of the Environmental Data Indicators show that these communities are not subjected to the selected variables of environmental stressors assessed in the EJ Screen. Residents that are adjacent and close to PR-123 in Juan Gonzalez Ward of Adjuntas exhibit higher impacts by these environmental stressors. The EA independently assessed most of these factors and reached the same conclusions. The determination that the proposed action would not have a disproportionate effect on these communities is based on the following:

1. The residents in these areas are presently not subject to environmental stressors as enumerated by EPA in the EJ Screen. Environmental data and will not be subject to any disproportionate impacts by the proposed action.
2. The proposed action will not lead to a significant increase in traffic through their communities. About 80% of the current traffic will be redirected to the new highway, substantially decreasing the presence of heavy freight trucks and through traffic on PR-123. This altered traffic pattern will occur within an isolated corridor, separated from the communities to the west by existing mountainous terrain and vegetation.
3. The proposed action will not hinder the access of these communities to essential services or cultural destinations such as churches, parks, community centers, medical offices, and public services.
4. The proposed action will not alter or reduce the accessibility of these communities to transportation infrastructure for these communities.
5. The benefits outlined in the purpose and need of the Environmental Assessment are fair to all resident segments within the region or in the two municipalities.

Response: The principal indicators for identifying Environmental Justice (EJ) communities were based on income levels, the percentage of the population with less than a high school diploma (greater than 30%), and the percentage of elderly in the community (over 20%). However, identifying EJ communities can be challenging in urban areas with diverse income levels and ethnicities. This is not an issue in the rural areas of the Central Region of the Island, where the entire Central Range

	<p>would cause any disproportionate adverse impacts.</p> <p>o We also recommend that the EA outline the opportunities for affected communities to provide input into the NEPA process. For example, the EA should include information describing what was done to inform these communities about the project and the potential impacts it will have on their communities, what input was received from the communities, and how that input was utilized in the decisions that were made regarding the project.</p>	<p>Region, including the area of the proposed action, exhibits very low-income levels (see income level map). The Justice40 website was also utilized to verify these findings.</p> <p>Based on lower population densities in this rural area a ward within each municipality was considered a community. The communities surrounding the proposed action studied were Arenas Ward and Guaonico Ward of the Municipality of Utuado, and Capaez Ward, Pellejas Ward, and Juan Gonzalez Ward of the Municipality of Adjuntas. All these wards were found to have household incomes below the poverty level and a high percentage of the population without a high school diploma. Guaonico Ward in Utuado and Capaez Ward in Adjuntas are the communities directly impacted by the proposed action.</p> <p>Analyses conducted on these communities indicate that those closer to the corridor of the proposed action experience fewer environmental stressors. The communities adjacent to PR-123 are exposed to greater environmental impacts due to their proximity to the roadway. However, even in these communities, the environmental stressors remain within acceptable levels. No significant and disproportionate differences were noted in these communities or others along PR-10. A “reference community” that is not an EJ community cannot be found in the region. Based on the EJSCREEN and Justice40 tools, these communities are not currently impacted by significant environmental stressors, and their geographical isolation will protect them from the proposed highway's impacts.</p> <p>Existing EJ communities along PR-123 will benefit from the proposed action as noise levels and roadside air quality will significantly improve with reduced traffic on PR-123. The reduction in potential hazardous substance accidents involving trucks carrying fuels and other hazardous materials will also positively impact these communities.</p> <p>It is important to highlight that the primary concern expressed during this process is the frustration over the prolonged time it has taken to advance the construction of the proposed action. Efforts to address these concerns and expedite the development by the Puerto Rico Highways and Transportation Authority (PRHTA) aim to prevent the denial, reduction, or significant delay in the receipt of benefits by these low-income populations. This commitment aligns with one of the three fundamental principles of environmental justice as outlined on the</p>
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Federal Highway Administration (FHWA) Environmental Justice website.

Response: EPA's comment will be addressed and incorporated in the EA. The findings of the EA demonstrate that the proposed action will not have significant impacts on residents of the communities adjacent or nearby to the current corridors. There are no sensitive receptors within the corridor of the project that would be impacted by air quality, noise or hazardous substances or any other environmental impacts that would impact these communities. During the construction phase of the project the mitigations plan to be implemented will prevent environmental impacts and inconveniences to residential areas, that are located far away from the corridor of the proposed action.

Response: EPA's comment will be incorporated in the EA. Communities residing along the completed segments of PR-10 have not reported adverse effects resulting from the highway's operation, regardless of whether they are classified as Environmental Justice (EJ) communities or not. Considering the assessment conducted and the distance of the proposed action from nearby communities, none of the temporary impacts anticipated during construction are projected to significantly affect adjacent communities. These impacts are not linked to any of the aforementioned conditions, nor are they disproportionately greater than the effects experienced by other residents not classified in this category. Similar expectations apply to the operation of this highway segment.

RESPONSE: EPA's comment will be incorporated in the EA. Details of coordination efforts with communities, interested parties, and the public are outlined in Section 5.1 of the EA and Chapter 6. Past public hearings have been held to discuss the proposed action and gather feedback from residents of Utuado and Adjuntas.

Additionally, close coordination with municipal authorities is maintained, as representatives from various sectors within each municipality provide input and express concerns regarding infrastructure projects through the planning offices of each municipality that manages their local plans. Various public participation processes have been provided as part of the proposed action. In doing so, PRDOH intended to receive early comments in their evaluation process to comply with NEPA. Input by local residents received by various means have been evaluated and some modifications were made to the EA for a better understanding of the proposed action by residents and interested parties.

Responses to the received comments after the publication of the draft of the Reevaluation published in June 2023

		<p>Q. Cumulative Impacts:</p> <ul style="list-style-type: none"> <li>• NEPA regulations define cumulative impacts as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.”</li> </ul>	<p>have been included in Attachment 25 of the EA. This EA process includes the provision of an additional thirty (30) day commenting period.</p> <p>PRHTA is coordinating to open a community outreach space in the City Halls of Utuado and Adjuntas. This will be included as a commitment in the revised EA. It will offer the communities the opportunity to meet and talk with project team members, as well as view renderings and other design materials related to the project. It will also allow residents of the communities to express their view and comments regarding the proposed action. The distribution of leaflets within each of the affected communities providing information of the project and informing them of the availability of the outreach space is also being planned. Written input and comments from residents of these communities will continue to be encouraged as well as other concerned groups and citizens within those municipalities. A video of the highway after it is built; including the areas surroundings in 3 dimensions is also being prepared for a better understanding of the proposed action.</p> <p>Q. Response: Cumulative effects are not a different kind of environmental effect; they are the combination of direct and indirect impacts that have occurred to a resource over time. Because cumulative effects focus on multiple actions to resources of concern, the evaluation is a resource-based analysis, rather than project specific. The methodology used was based on accepted practices for assessing cumulative impacts by transportation projects. PRHTA has taken into account the cumulative impact of the proposed action when combined with other past, present, and reasonably foreseeable actions, regardless of the entity responsible for those actions. This consideration was part of the cumulative impact analysis included in the EA. The resources identified within the proposed action that were subject to this analysis were archaeological resources, wetlands and water bodies, threatened and endangered species, and communities in the area.</p> <p>When a proposed transportation project has the potential to increase mobility and accessibility, other factors may limit the potential for induced growth. Constraints on growth include factors such as lack of available adequate developable land, lack of water and sewer infrastructure, land use controls, regulatory constraints and geographical and topographical limitations.</p>
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To the best of the agency's knowledge, no additional significant activities have been identified by either Federal or Non-Federal agencies within the study area. The analysis in the EA considered the following factors:

- The proposed project involves the relocation of existing PR-123, meaning the vehicular traffic flow already exists within the study area. No significant diversion of traffic is anticipated, and associated impacts would remain localized.
- Population forecasts for Adjuntas, Utuado, and the rest of the island indicate a trend toward reduction, suggesting no foreseeable pressure for additional transportation or significant developments in the study area.
- The proposed action has been incorporated into State Transportation Plans after FEIS approval, as shown in the Zoning Maps of Adjuntas and Utuado, preserving the corridor for its intended use.
- Local regulations prohibit direct access to the proposed action, preventing development sprawl in the study area.
- The project is located in a rural area with scattered residential uses and mostly open spaces, including abandoned farms previously used for coffee cultivation.
- Municipal land use plans classify properties adjacent to and surrounding the corridor as specially protected lands, prohibiting development.
- Land development restrictions along the proposed action corridor mitigate potential cumulative commercial and residential development associated with urban sprawl, exempting the project from the cumulative effect situation described in CEQ's guidance.
- Once constructed and operational, the proposed action's condition would be similar to sections of PR-10 already in operation.
- A review of National Wetland Inventory Maps indicates no extensive wetland systems within the project corridor, with existing wetlands primarily associated with riverine systems and small creeks. Current land use restrictions do not support cumulative future impacts from construction projects within the study area.
- However, these conditions may change in the event of a hurricane or tropical storm.

In light of these factors, the PRHTA deems the provided cumulative impact analysis in the EA to be sufficient.



R.  
Cumulative Impacts:

- The EA states: “Aside from the proposed completion of PR-10, no new highway construction or other types of transportation related projects have been identified for the foreseeable future in the study area.”
  - o The EA indicates that the study area for the cumulative impact analysis is the corridor of the original proposed action as evaluated in the 1979 FEIS, or the construction of the entirety of the PR-10, and concludes that there would be no cumulative impacts for Air/ Noise Quality, Land Use, Surface Water Resources, and Wetlands.
    - The EA should make distinctions between the impacts associated with the proposed action (the construction of the remaining four highway segments) and construction of the entire PR-10 highway in the cumulative impacts analysis. In particular, the impacts of the proposed action should be evaluated independently, and the cumulative impacts section should consider other past, present, and reasonably foreseeable future actions. It is reasonable to believe that that impacts from the larger project on a whole are likely to have a larger impact on the environment than construction of a smaller highway segment.

S.

- EPA recommends consulting CEQ’s cumulative effects guidance, Considering Cumulative Effects Under NEPA. ([https://ceq.doe.gov/publications/cumulative\\_effects.html](https://ceq.doe.gov/publications/cumulative_effects.html))

R.  
Response: EPA’s comment will be incorporated for the revision of the EA. The cumulative analysis is based on the expected impacts of the proposed action when added to other existing or proposed actions, on a resource within the Area of the Proposed Action. As with most NEPA assessments, the analysis should be commensurate with the project's impacts and the resources affected. Please see page 3 in “Consideration of Cumulative Impacts In EPA Review of NEPA Documents”, U.S. Environmental Protection Agency, Office of Federal Activities (2252A) EPA 315-R-99-002/May 1999. Impacts assessed are direct or indirect impacts to an important resource. The basis for this analysis is the fact that the impacts of each individual action would be minimal, but the sum of all actions could pose a potential negative impact to an important resource located within the Area of Effect of the proposed action. Geographic boundaries and time periods used in cumulative impact analysis are based on all resources of concern and all of the actions that may contribute, along with the project effects, to cumulative impacts. Page 8 of EPA’s guidelines, idem. Important resources located within the PR-10 corridor that will not be directly or indirectly impacted by the proposed action need not be included in this analysis.

The Environmental Assessment (EA) specifies (on page 100) that the study area for analysis encompasses the corridor of PR-10, identified as the proposed action, along with its immediate surroundings and resources. The reevaluations concern the remaining four sections of PR-10 between Adjuntas and Utuado. Furthermore, the proposed action is defined in the Executive Summary and previous reevaluations as "the construction of the remaining sections of PR-10 between the municipalities of Utuado and Adjuntas, with its terrestrial connection made through state road PR-123."

The PRHTA notes that the EA does not address the consideration of the other sections of PR-10 already in operation not directly or indirectly impacting resources located within the Area of Effect of the proposed action as part of the Cumulative Impact Analysis.

S.  
Response: EPA’s recommendation will be taken in consideration for the revision of the EA. However, it shall be noted that the methodology used for assessing impacts was based on accepted practices for assessing cumulative impacts of transportation projects. PRHTA

		<p>T.</p> <p>o Additionally, the analysis of cumulative impacts should not be limited to projects of a similar type (transportation). The analysis should consider any co-located projects and how concurrent development of the proposed action and these other projects may impact resource categories within the project area. Further, any subsequent repairs and rehabilitation to the PR-123, would be considered a reasonably</p>	<p>used the above-mentioned reference as well as FHWA and HUD guidelines covering this matter. The Cumulative Impact analysis subjects in the EA considered HUD and FHWA requirements and relevant factors. A historical review of aerial photographs for the area revealed limited development and discreet types of constructions. Reviewing cases submitted for review and approval by the Permits Management Office (PMO), the local government agency handling such permits, was conducted using its Interactive website Map application. Results showed that most planning and permitting for new developments involved land subdivision and construction of individual residences. While approvals for the proposed action were identified, approvals for projects from other agencies were not found in this database, supporting the notion that the study area is not under pressure from near-future developments considered in the cumulative effects section of the EA. Moreover, the analysis of cumulative impacts should not solely focus on projects of a similar type (transportation). It should also consider any co-located projects and how concurrent development of the proposed action, and these other projects may affect resource categories within the project area. Additionally, any subsequent repairs and rehabilitation to PR-123 should be deemed reasonably foreseeable actions and included in this analysis. The PRHTA has not obtained information about any co-located projects impacting resource categories within the project area. As discussed in the EA, further improvements to PR-123 are not considered feasible foreseeable actions. Repairs to PR-123 would be limited to those required to maintain its operation following landslides or damage from natural disasters. Moreover, local land use plans enforced by the municipalities of Adjuntas and Utuado restrict development along the Proposed action corridor, preventing additional project development included in the cumulative analysis. Finally, the proposed action has been included in state transportation plans since the FEIS approval.</p> <p>T.</p> <p>Response: PRHTA agrees with the comment and after reviewing the Permits and Management Office database has not obtained any information regarding co-located projects that might impact the resource categories within the project area. Additionally, as discussed in the EA, the PRHTA has determined that further improvements to PR-123 are not being considered as feasible foreseeable actions. Repairs to PR-123 would only address maintenance necessary to keep it operational following landslides or damage from natural disasters. Furthermore,</p>
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foreseeable action and should be considered in this analysis.

U.

o The PR-10 runs approximately 44 miles spanning from the north to south coasts and runs parallel to rivers such as the Rio Grande de Arcibo. The potential for the project to contribute to habitat fragmentation should be reevaluated in the EA and an analysis of the cumulative impact of the PR-10 project as a whole should be included in the appropriate section. According to the Federal Highway Administration's Wildlife Crossing Structure Handbook fragmentation is particularly harmful to "wildlife that have large area needs, are found in relatively low densities, and have low reproductive rates." When road infrastructure separates wildlife populations from vital sources of food, water, or shelter; or where roads bisect optimal habitat, they can be especially harmful to wildlife survival. o Additionally, the potential cumulative impacts of the project on water bodies, including those that are already impaired/no longer serve as viable sources of potable water or those which may be vulnerable to climate change should be assessed.

local land use plans enforced by the municipalities of Adjuntas and Utuado restrict development along the path of the proposed action corridor. Consequently, no additional project development has been identified or included in the cumulative analysis. Lastly, the Proposed action has been part of the state transportation plans since the FEIS approval.

U.

Response: As previously stated, the proposed action solely focuses on completing a 4.75-mile stretch of PR-10 between the municipalities of Adjuntas and Utuado. NEPA requirements as well as Guidelines developed or assessing cumulative impacts of highway projects establish that the location of the effect or impact to be assessed must be within the boundaries of systems affected by the proposed action. Indirect and cumulative impacts must be considered only if they are reasonably foreseeable. Guidelines for assessing avoidance measures of highway projects are aimed at the reduction of habitat fragmentation when avoidance of the resource is not completely possible. Another consideration is to minimize barrier effects of the roadway. Both recommendations have successfully been applied to this project. Early in the year 2000's the proposed action along with two previous sections of PR-10 north of the northern limit of the proposed action, were shifted further east to reduce earth movement, projects cost, relocation impacts as well as habitat fragmentation. The barrier effect of this project has been accomplished by providing 20 bridge structures that represent approximately 32% of its project length as well as the drainage structures of the other sections of the highway, that will allow the passage of the local fauna through it. Additional enhancements of these measures are expected during the remaining design process of the proposed action.

Regarding the FHWA's Handbook discussing fragmentation of wildlife habitats and separation of wildlife populations from vital sources, the PRHTA offers the following observations:

- Historical data supplemented by recent reviews from agencies like USFWS and DNER revealed no critical or endangered species habitats, state-designated forests, or conservation areas along the proposed action's path.
- Concerns about the road infrastructure separating wildlife from food and water sources overlook the presence of small streams crossing the proposed route, ensuring a continuous water source on both sides of the roadway. Additionally, the project

includes the construction of 20 bridge structures, maintaining terrestrial connections across the road. PRHTA's response to a public comment received during the draft reevaluation publication offers further insight:

- Mitigation measures to reduce impacts on flora and fauna, including endangered species, were developed through an Environmental Impact Statement (EIS) process, involving specialized agencies like USFWS and DNER. These measures include reforestation, sensitive area identification, and habitat preservation protocols.
- Concerns about owl and insect impacts were addressed with available literature and best practices. Although specific studies for Puerto Rican owls were not found, measures such as reforestation and sensitive area identification aim to mitigate impacts on all species. Similarly, concerns about insect decline due to road traffic are addressed by the project's expected low-traffic impact.
- Lighting systems along the project route are essential for safety but may impact the environment and human health. State Regulation 8493 outlines measures to control light pollution, including restrictions on intensity, angle, and scheduling of illumination. Compliance with these regulations aims to mitigate potential environmental and health impacts associated with additional lighting sources.

Overall, the PRHTA has taken comprehensive measures to address potential environmental impacts associated with the proposed action, as outlined in the FHWA's Final Environmental Impact Statement and endorsed by relevant agencies.

Response: EPA's recommendation will be adopted for the revision of the EA. As previously mentioned, PR-123, situated east of the proposed action, has been affecting nearby water bodies' quality since its inception in the early 20th century. While the proposed action aims to redirect most traffic to the new highway, any additional impacts beyond those arising from construction activities are unlikely across the entire study area. In contrast, the existing PR-123 presents a greater risk of water body contamination due to its inefficiency and unsafe conditions compared to the proposed route. The likelihood of spills from accidents, including those involving petroleum products, is higher on PR-123 than on the proposed action.

Concerning climate change, the proposed action is expected to enhance infrastructure resilience in the area and the western part of the island, as outlined in Chapter

		<p>V. Mitigation/Adaptive Management:</p> <ul style="list-style-type: none"> <li>• The EPA supports the use of adaptive management for decision-making where there is uncertainty about the level of impact, the ability of a resource to respond to change, or the effectiveness of mitigation.</li> </ul> <p>W. Mitigation/Adaptive Management:</p> <ul style="list-style-type: none"> <li>• We recommend that a monitoring and mitigation plan be required to ensure compliance with all proposed avoidance and minimization measures and to assess their effectiveness over time.</li> </ul>	<p>3 of the EA (page 29), which details the project's need and purpose. Regarding other potential cumulative impacts on water bodies, no federal or non-federal actions are known to be planned for the study area at the time of this document's drafting. Additionally, current land use plans for adjacent properties restrict development, limiting potential changes in water quality, except for those resulting from natural disasters. The project site is primarily rural, with scattered residential use and minimal commercial or industrial activity. The rugged terrain further limits intensive development but supports agricultural purposes.</p> <p>V. Response: PRHTA acknowledges the importance of adopting adaptive management practices for decision-making purposes. DNER has already approved a Flora and Fauna Management Plan, which mandates the presence of an onsite biologist during project construction to monitor rare and/or endangered species within the project corridor. Additionally, earthwork activities, such as clearing and grubbing, will be avoided from January through July to minimize disturbance during the nesting season of these species near the project area. This plan serves as an adaptive management measure to mitigate potential impacts on wildlife. The mitigation and adaptive management will also occur throughout the design and build process and will be implemented and enforced by all parties.</p> <p>W. Response: EPA's recommendation will be incorporated for the revision of the EA. However, it shall be noted that the project construction includes monitoring and mitigation plans. Detailed information about these measures is provided in Section 5.3 of the EA, titled "Control Monitoring, Mitigation, and Environmental Commitments." The project construction includes monitoring and mitigation plans. Detailed information about these measures is provided in Section 5.3 of the EA, titled "Control Monitoring, Mitigation, and Environmental Commitments." The activities of the monitoring process include the following:</p> <ol style="list-style-type: none"> <li>1. A qualified archeologist will be part of the inspection team during the construction phase of the project to monitor the effective protection of identified cultural as well any possible discovery of archeological artifacts during earth movement activities.</li> </ol>
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	<p>X. Additional Comments: • EPA supports the conservation commitments presented in the EA with respect to preserving the environment and minimizing impacts to listed species and habitat.</p> <p>Y. Additional Comments: • In the Endangered Species section, the EA states that “Regarding the Puerto Rican boa, no adverse impacts to said species are anticipated. However, consultation with the USFWS concluded with a determination of A May Affect Not Likely to Adversely Affect, if a boa is captured and relocated.” o The conclusion that no adverse impacts are anticipated is misleading given that the USFWS concludes that the project May Affect Not Likely to Adversely Affect the Puerto Rican boa. This discrepancy should be rectified in the EA.</p> <p>Z. Additional Comments: • EPA strongly encourages PRHTA to translate all documents shared for public meetings into Spanish to ensure a robust</p>	<p>2. An Inspection Team will be responsible to monitor and oversee contractor’s compliance of Mitigation Measures of the FEIS and EA of this project, that will be incorporated and form part of the contractual agreement of Design-Build process. 3. A water quality consultant will be contracted to monitor water quality in Rio Grande de Arecibo and its tributary water bodies along the proposed action corridor during construction to monitor the effectiveness of BMP measures adopted for erosion and sedimentation control and to verify compliance of the SWPP.</p> <p>As part of the Protocols agreed with the DNER, qualified biologists will monitor the construction phase of the project and will be responsible of compliance of mitigation measures and established protocols for the protection of state endemic species and federal protocol for the protection of the Puerto Rican Boa as well as establishing that endangered species are not affected by the construction of the proposed action.</p> <p>X. Response: PRHTA agrees with this comment.</p> <p>Y. Response: The USFWS utilizes this language when granting their endorsement for the project. If any significant impact were anticipated, the agency would not have issued their endorsement under the provisions of Section 7 of the Endangered Species Act (ESA). This requirement from the agency reinforces that no adverse impact is anticipated if a Puerto Rican boa specimen is discovered and safely relocated to a secure location as outlined in the PBO established by the agency.</p> <p>Z. Response: The EA has been translated into Spanish in accordance with existing laws and regulations. However, due to the extensive content of the attachments, such as technical documents and other information, they are</p>
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public outreach process. The record of the comments should show the transcription of the comment itself, not a summary.

presented in the language of the original document. According to the Department of Justice's (DOJ's) Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs, Federal Coordination and Compliance Section Civil Rights Division, U.S. Department of Justice, May 2021, the translation of documents is necessary and limited to "vital documents." A document is considered vital if it contains information necessary for individuals seeking benefits or services from a federal agency. Examples of vital documents include applications, consent or complaint questionnaires, disciplinary actions, notices of rights, notifications informing individuals with limited English proficiency about the availability of free language assistance, written tests not aimed at assessing English proficiency but competence for activities such as obtaining a driver's license or specialized work where English proficiency is not required, and letters or notices requiring a response from the beneficiary or client.

Even for documents classified as critical, the Federal Coordination and Compliance Section Civil Rights Division of the Department of Justice (DOJ) states, in an illustrative manner, that translating vital information contained within the body of lengthy documents is sufficient to address the needs of individuals with limited English proficiency. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and Executive Order 13166, signed by the President of the United States and known as "Improving Access to Services for Persons with Limited English Proficiency," do not mandate the translation of entire documents. In fact, the Executive Order specifically states, "For many larger documents, translation of vital information contained within the document will suffice, and the documents need not be translated in their entirety."

Regarding the summary of comments, a summary was prepared mainly for comments expressing support for or objection to the proposed action without providing substantial analytical facts or information for its environmental evaluation.

AA.  
Additional Comments:  
• EPA acknowledges that this EA is a reevaluation of an FEIS, however, as currently written the document is sometimes unclear and repetitive. Additionally, figures relevant to the analyses should be included in the main

AA.  
Response: The Environmental Assessment (EA) was developed to fulfill the unique criteria set by both the Federal Highway Administration (FHWA) and the Department of Housing and Urban Development (HUD), which differ from each other, and determine the need for a Supplemental EIS. This explains the current organization of the document. As for why figures were included as attachments rather than within the main text,

		body of the document, rather than in the appendices.	this choice was made to closely adhere, as possible, to the mandated page limit of 75 pages, as required by recent updates to the National Environmental Policy Act (NEPA) (40 CFR Parts 1501.5) for EA's.
42	Private Citizen	I am referring to the planned construction of the pending section of PR# 10. This pending section represents the greatest environmental risk for the populations downstream of the Río Grande de Arecibo, it is an unnecessary investment to save 15 minutes on the current route and is a scandal the investment of 550 million dollars. We have studied the proposed route, and it would be the biggest environmental disaster for the central area of Puerto Rico. The proposal to obtain these funds is based on half-truths, saying that the communities along the route were cut off is a half-truth, we demand that these processes be opened to public hearings so that the voices of the residents are heard. It is not necessary to build a new section, the most reasonable alternative is to readjust and repair the existing section. The environmental community flatly rejects this project proposed by the government of Puerto Rico.	
43	Private Citizen	1. The EA fails to disclose the true environmental effects of the construction of PR-10. The 109-page EA appears to touch on all environmental concerns associated with the construction of a highway through some of the steepest and wet terrain in Puerto Rico. It contains all the endorsements of federal and commonwealth agencies, and it complies with regulatory requirements for floodplains, wetlands, federal wildlife, water quality (excluding sediments), explosives, noise, and others. Addressing local environmental laws and regulations is notably absent. Page after page the EA explains federal regulations and how they will be addressed. It's a narrative that is typical of EA's seeking a FONSI while ignoring critical environmental impacts. The following three quotes in italics from the EA summarize how the proponent agencies propose to deal with the most serious environmental hazard facing the	Thank you for your comments on the Environmental Assessment (EA) for the proposed action. We appreciate your engagement and the opportunity to address your concerns regarding erosion and sedimentation during construction and operation, landslides, maintenance costs, and your recommendation for an Environmental Impact Statement (EIS).  The EA includes a comprehensive analysis of potential erosion and sedimentation impacts. Recognizing the importance of effective mitigation, the EA outlines several erosion control measures, including silt fences, sediment basins, erosion control blankets, re-vegetation, and site management practices designed to minimize soil disturbance and prevent sediment from reaching water bodies.  To ensure the efficacy of these measures, a detailed Monitoring Plan will be implemented. This plan encompasses continuous supervision of the Erosion Control Plan and Best Management Practices (BMPs) throughout the project lifecycle. Additionally, regular monitoring of the Rio Grande de Arecibo's water quality will be conducted to identify any potential impacts from



construction of PR-10. After each quote, I add comments in red regarding the implications of the quote.

P 70. “Los proyectos de construcción, como el que se indica en este informe, generan importantes cantidades de sedimentos y residuos que, de no manejarse correctamente, pueden contaminar las aguas de escorrentía pluvial.

” This is a true statement that falls short regarding the potential impacts of the sediments generated by the PR-10 construction. One expects that an EA seeking a FONSI would disclose the quantity of sediments and residuals generated by the project and exactly how they will be handled to avoid polluting the waters and causing excessive handling costs during extreme events that generate landslides and more sediments.

P 71. “Antes de comenzar las actividades de construcción, el contratista debe cumplir con dos condiciones específicas:

- Obtener cobertura bajo el Permiso General de Construcción (PGC) 2022 emitido por la EPA. Esto implica presentar un Aviso de Intención (NOI, por sus siglas en inglés) a la EPA al menos catorce (14) días antes de comenzar las actividades de construcción. La presentación de la NOI requiere un SWPPP preparado y debidamente firmado por las partes responsables.

- Obtener un Permiso Único Incidental (PU) de la OGPe de Puerto Rico. El PUI incluye un Plan de Control de la Erosión y la Sedimentación para el proyecto, similar pero no idéntico al SWPPP.

” This way of addressing the environmental issue, fails to disclose anything and simply passes the baton to the contractors, who have the burden of acquiring permits and following laws and regulations. Any failures by the contractors expose the public and the environment to the serious consequences of excessive sedimentation and erosion by landslides. One does not expect government agencies to abandon the public interest to such a degree. Moreover, this strategy of

construction activities. Compliance with both federal and local regulations will be ensured, with the contractor responsible for executing the plan and the Puerto Rico Highways and Transportation Authority (PRHTA), as the project sponsor, overseeing compliance and adherence.

delegating to private contractors the responsibility of maintaining environmental quality, bypasses the environmental issue and fails to add substance or justification to the discussion leading to a FONSI.

A.  
P 74. “7. Ingenieros geotécnicos, de transportación y civiles calificados, así como otros profesionales relevantes, como profesionales ambientales y geólogos, se unirán al equipo para garantizar que el diseño, la construcción y el mantenimiento de la carretera sigan las mejores prácticas y cumplan con los estándares de seguridad. Su experiencia ayudará a realizar estudios geológicos detallados, analizar la estabilidad de los taludes y recomendar medidas de mitigación apropiadas que se considerarán en la fase de diseño y construcción del proyecto.

” This statement implies that the agencies seeking a FONSI let the public know that if we trust them, a dream team of professionals will be assembled in the future to assure that the PR-10 construction will benefit from the best minds, studies, and actions, all leading to a safe highway and healthy environment. One would think that a FONSI is based on cold facts as opposed to promises of a better future. The EA is based on promises for the future as opposed to an objective analysis of environmental impact.

When addressing landslides along the PR-10 alignment, the EA shows a landslide map and appears to celebrate that according to the map, fewer than 25 landslides occurred in their project area. No other effort is made to validate the map, describe the size and frequency of the landslides or their potential to disrupt construction or road operation and maintenance. In fact, the whole issue of sediment production is completely ignored by the EA (other than the quotes above). However, this issue has the potential to affect water quality in the region and even influence the coastal systems through the

A.  
The EA addresses potential landslide risks through comprehensive geotechnical studies and risk assessments. Identified landslide-prone areas will be mitigated through engineering solutions, including retaining walls, proper drainage systems, and slope stabilization techniques such as berm construction to protect fills and nail installations along slope cuts. The use of berms to protect fills and the installation of soil nails to stabilize slope cuts can be effective measures in mitigating landslide risks and enhancing the stability of the proposed action. Berms are raised barriers made of soil or other materials that can be used to protect fills from erosion and provide additional support. Berms help to redirect surface water runoff away from the fills, reducing the risk of erosion and washouts. This is particularly important in areas with heavy rainfall. By placing berms at the base of slopes, you can reduce the effective slope height, thus lowering the potential for landslide initiation. Berms manage surface water runoff and reduce erosion, protecting the integrity of fills and reducing the load on the slope.

Soil nailing involves inserting steel bars (nails) into the slope to reinforce the soil and provide additional stability. Soil nails create a reinforced zone within the slope, enhancing its overall stability and reducing the likelihood of slope failure. This technique can be adapted to various slope conditions and geometries, making it suitable for different types of soil and rock formations. Compared to other stabilization methods, soil nailing is often more cost-effective and quicker to implement, especially in difficult terrain. Soil nails provide internal reinforcement to the slope, increasing its shear strength and resistance to failure.

Infrastructure projects worldwide have successfully used berms and soil nails to stabilize slopes and protect roads, showing significant reductions in landslide occurrences and maintenance needs. These measures, when combined with geotechnical and environmental management strategies, will mitigate landslide risks and ensure the longevity of the infrastructure.

discharge of Rio Grande de Arecibo. The agencies that prepared this EA have the information required to estimate potential sediment production by the construction. The information is imbedded in the geotechnical reports appended to the EA. The reports illustrate the level of cuts and fills required to complete the PR-10. The volume of sediments could be estimated from those reports and an analysis made of the effects that such levels of sedimentation would have on the river channel, river water quality, estuary, and coastal systems, particularly during extreme events, when sediments are expected to be on the move downhill at high concentrations. The EA has no consideration or analyses of the sediment issue with this construction. It is a fatal flaw of the EA. Sedimentation of the basin is a cumulative effect not addressed by the EA.

**B.**

2. The EA fails to disclose the projected interruptions of service and maintenance costs of the PR-10 project. The EA mentions the effects of hurricanes Irma, Maria, and Fiona on the existing segments of PR-10 and even lists projects in progress for repairing those effects (page 197). Yet, in the analysis of the proposed PR-10 extension, the EA is silent on the lessons learned (if any) with the operation of the existing PR-10. The EA also fails to consider that the presence of roads increases the frequency of landslides (published results by the USGS). The public and the process of EA development, deserves and requires, respectively, such discussion given the enormous costs of this highway (60 million dollars per kilometer). The cost of repairing and maintaining the road after a hurricane or extreme rainfall (common events in Puerto Rico), can be quite high as depicted in the following public notice from the proponent agencies:

Landslide Repairs on PR-10 in the Municipality of Utuado

**B.**

The proposed action's design will effectively mitigate landslide risks and service disruptions on the proposed action. Maintenance costs consider a recurrence interval of 3 to 8 years, with measures incorporating advanced runoff control and erosion management elements. The agency has acquired land to the west of the corridor, allowing control over future land use and additional mitigation measures like reforestation and runoff reduction structures to manage soil saturation.

The project has been evaluated using Caltrans's Cal-B/C version 8.1 model, adapted for Puerto Rico, in line with US Department of Transportation guidelines. The analysis shows that the project delivers significant financial returns and addresses critical infrastructure needs, leveraging economic benefits to outweigh costs.

The maintenance costs estimate for a 20-year period are approximately \$7.5 million. This estimate accounts for regular maintenance activities essential for the long-term integrity and safety of the highway, including erosion control measures and the maintenance of vegetation and drainage systems. A detailed and more comprehensive Operation and Maintenance Plan will be developed after completion of the design phase.

ID: 693C73-22-R-000005 • Type: Solicitation  
Proposals from all business concerns will be accepted for the Landslide Repairs on PR-10 in the Municipality of Utuado, Project PR ER PRMNT RPR(10), Solicitation Number 693C73-22-R-000005, located in Utuado, Puerto Rico. The project consists of repairing damage caused by Hurricanes Irma and Maria on PR-10 between kms 41.6 and 47.5. The work includes embankment reconstruction, reinforced soil slope systems construction, drainage systems installation, landslide stabilizations, gabion retaining wall systems, soil nailing walls, box culvert construction, pavement restoration, pavement marking placement, removal and replacement of guardrails, maintenance of traffic and temporary traffic control, construction of multi-span bridges, and other miscellaneous work. The project will be split into multiple work schedules/contract options, with the cost of the entire project expected to fall within the price range of greater than \$10,000,000.

These are not cheap repairs, repairs that eventually are the responsibility of the Commonwealth, who is bankrupt and lacks funds for even the basic services to the public (health and education). An EA must include an economic analysis of the proposed project, including its susceptibility to extreme events and the cost of repairs. The public has the right to know how public funds are committed by their agencies.

C.

One last point: The EA introduces a scale of environmental impacts to assess various aspects of the project. The environmental scale of impact is not formally defined in the EA, even though it is used several times. The reader is not informed of the range of effects considered by the scale nor the procedure that is used to arrive at a particular level of the scale. Is the scale linear, logarithmic, or exponential? The

C.

The EA was also used to determine if there is a need for a Supplemental EIS and it was determined through the EA analysis that a SEIS is not needed. While we acknowledge your recommendation for an EIS, the EA process has rigorously evaluated the environmental impacts of the project. The qualitative discussions within the EA, supported by the Monitoring Plan, provide a robust framework for managing and mitigating environmental impacts. We believe the EA sufficiently addresses significant environmental concerns, ensuring

problem is that the use of the scale is not consistent in the EA. Only two scale numbers appear (level 2 and level 3). Level 2 means no impact. Level 3 on page 79 is minor and anticipated impact (“impacto menor y previsto”). Level 3 on pages 74 and 75 is adverse but light impact (“impacto adverso leve”). How should a reader deal with these inconsistencies, but worse yet, such a high level of subjectivity when addressing environmental impacts? The EA assures the public that dealing with adverse effects is backed by their (the agencies) commitment to do right.

Conclusion: The EA is inadequate to sustain or justify a FONSI. It lacks the information required to assess the critical environmental problems that affect the project and those caused by the project. Heavy rainfalls and landslides will continuously affect PR-10. Instead of addressing the arguments that would justify a FONSI, the EA delegates to private contractors the government’s responsibility to plan and address the problems with landslides and sedimentation that are sure to occur. Because the EA is deficient in identifying the environmental issues, it cannot be used to assure that no harm to environment will ensue. An EIS is needed to conduct an updated, thorough, and objective evaluation of environmental impacts and alternative courses of action for this section of PR-10. Among those impacts the EIS should include the sedimentation of the Rio Grande de Arecibo basin, the expected frequency of landslides and their effects on the environment, and the cost estimates for overcoming landslide effects and maintaining PR-10 open. Such analysis should lead to an objective cost/benefit analysis of the project and its alternatives.

that all potential effects are appropriately managed and mitigated. The proposed action has an environmental compliance determination by local concerned agencies and will comply with local laws and regulations through permitting and other measures.

The U.S. Department of Housing and Urban Development (HUD) utilizes specific nomenclature and criteria to rate the impacts of proposed actions under their environmental review processes, guided by the National Environmental Policy Act (NEPA) and other related regulations. This rating system is designed to assess and categorize the environmental impacts of housing and urban development projects to ensure that they are sustainable and compliant with federal environmental standards.

HUD employs a rating system that includes categories such as:

1. No Impact: The proposed action will not result in any significant environmental changes.
2. Minor Impact: The proposed action will have minimal and manageable environmental effects.
3. Moderate Impact: The proposed action will have noticeable environmental impacts that may require mitigation measures.
4. Significant Impact: The proposed action will have substantial environmental effects that necessitate thorough analysis and extensive mitigation strategies.

The categories are straightforward and easy to understand, making them accessible to both professionals and the general public. This clarity helps in communicating the potential environmental impacts effectively. The range from “No Impact” to “Significant Impact” covers the entire spectrum of possible environmental effects. This comprehensive coverage ensures that all potential impacts are considered and assessed. The inclusion of mitigation requirements in the “Moderate Impact” and “Significant Impact” categories underscores HUD’s commitment to addressing and minimizing adverse environmental effects. This focus on mitigation is crucial for responsible environmental management. The system allows for nuanced assessments. For instance, projects that initially fall into a higher impact category can be moved to a

lower category if effective mitigation measures are proposed and implemented.

HUD's rating criteria align with NEPA's requirements and other federal environmental regulations. This alignment ensures consistency in environmental impact assessments across different federal agencies and programs. The ratings provide a clear framework for decision-making, helping HUD officials, project planners, and developers understand the level of environmental scrutiny required and the necessary steps to mitigate impacts.

Based on the above, HUD's nomenclature for rating the impacts of proposed actions is generally adequate and effective in guiding environmental reviews. It balances clarity, comprehensiveness, and regulatory alignment, making it a useful tool for assessing and mitigating environmental impacts. However, there is room for improvement in terms of specificity, public engagement, and periodic updates to ensure the system continues to meet contemporary environmental challenges.

In conclusion, we are committed to constructing and operating the proposed action to the highest environmental standards. The proposed mitigation measures, coupled with continuous monitoring and strict adherence to regulatory requirements, will effectively manage erosion and sedimentation, prevent landslides, and control maintenance costs.

We value your input and encourage ongoing dialogue as the project progresses. Should you have any further questions or require additional information, please do not hesitate to contact us.

44	Local Government Representative	<p>A. Absence of public participation</p> <p>a. The extension of the PR-10 is very expensive and risky, but there is a viable alternative</p> <p>b. There is no need to provide an additional road for transit between Adjuntas and Utuado</p> <p>c. The population of Adjuntas and Utuado has been shrinking</p> <p>d. The extension of PR-10 does not benefit rural communities with access through PR-123.</p>	<p>A. Answer: Your comments and recommendations have been noted and will be taken into consideration during the final EA review and preparation of the proposed action. The public participation process complies with the Public Participation requirements of the current environmental federal regulations as established by the CEQ and has had the active participation of hundreds of citizens throughout the process. The agencies involved in the proposed action are relying on the public notice requirements as the means of public participation. Ineffectiveness of the proposed project to achieve the desired objectives.</p> <p>a. Answer: The studies of alternatives carried out for this project using the PR-123 have shown that the cost of carrying this road is much more expensive than the selected alternative, would require the acquisition and displacement of the families surrounding the PR-123 highway and would have greater impacts on the bodies of water and natural resources of the area.</p> <p>b. Answer: The need and purpose of this project is to complete PR-10 to provide a resilient transportation corridor as a measure to prioritize risk mitigation, a key asset that in the aftermath of a disaster event will contribute to the island's resilience. The current Intermodal Transportation Plan has the construction of this project as a high priority. From the point of view of traffic safety, this road represents a danger to life and property due to its geometric deficiencies and because it is a road with a high number of cargo trucks that travel through it, especially gasoline trucks and other flammable liquids. During periods of emergencies, it does not have the necessary attributes to adequately serve the needs of a primary transportation route. It is also an important way to link the northern part with the southern part during these types of events.</p> <p>c. Answer: In addition to the reasons stated above, the territorial plans of both municipalities contemplate the construction of this road to improve the quality of life of their communities and to improve the development of their economies to stop the migration of their citizens. These plans are in harmony with the Planning Board's Land Use Plan, and represent the aspirations of the citizens of those municipalities, who collaborated in their planning and approval.</p> <p>d. Answer: The benefits of this pathway are outlined in the EE and primarily consist of providing a safe pathway to their work areas, on their travel to obtain services, to</p>
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**B. Serious and irreparable environmental impact not calculated**

a. Impacts to bodies of water due to sedimentation

b. As we can see on page 37, it is alluded to that the Environmental Quality Board did not carry out any additional study and limited itself to re-certifying the DIAF of 1979.

c. In the last paragraph of page 47 it is indicated that the movement of approximately 760,000 cubic meters of material is estimated only in the cleaning of the area, not counting the cuts and fillings.

have safe and prompt access during a health emergency or weather event, as well as to receive prompt help when there are utility failures in communities. It will also benefit families adjacent to PR-123 from vehicular traffic that uses it for non-local trips.

a. Answer: Environmental impacts and proposed measures for erosion and sedimentation control are discussed in the EA. The mitigation measures envisaged are outlined in Section 5.3 of the document. They will guarantee faithful compliance with the federal and local regulations that regulate this issue. Subsequent studies have validated the initial findings of the type of flora and fauna of the corridor. Biologists from the Department of Natural and Environmental Resources and the Fish and Wildlife Service have walked the corridor and validated the initial findings. In 2014 they requested a more detailed study to corroborate if there was the presence of Species on the federal list of Rare or Endangered Species and the results were negative. Both agencies certified the validity of these determinations through letters to that effect. See EA Attachment 11.

b. Answer: The environmental process of this project has entailed multiple environmental re-assessments and environmental studies for its updating. The Quality Board, now OGPE, has evaluated the documentation submitted and has responsibly discharged its responsibilities established in the local environmental laws. See EA Attachment 4.

c. Answer: The EA presents the mitigation measures that will be taken to control erosion and sedimentation of the project. In the DIAF of the PR-10, the Chapter already anticipated that this area was the most susceptible to landslides due to its geology and type of soils. The proposed design contemplates the installation of berms in the fills and the installation of nails in the cuts to handle the issue of soil stabilization and avoid landslides at the points throughout the project that have been detected to be the most susceptible to this type of situation. The handling of surplus material will be handled in compliance with the environmental laws that regulate this matter.



d. The flora and fauna studies were completed in 2002 and have not been updated

e. A hydrological modeling program HEC-HMS, developed by USACE in 2016, is being used

f. On page 62, 6 wetland crossings along the project corridor are mentioned, and it is further indicated that the first crossing will involve disturbance of wetlands that are clearly identified on the USFWS National Wetland Inventory Maps.

d. Answer: The inventory of flora and fauna of this project has been carried out on multiple occasions since the preparation of the DIAF of the PR-10 from Arecibo to Ponce. Subsequent studies have confirmed that species within the corridor are typical of the system. The area is located in the Subtropical Humid Forest life zone (Ewel & Whitmore, 1973) and is composed primarily of a combination of submontane and low montane evergreen forest/shrubland and active/abandoned shaded brown, submontane humid evergreen forest, and grasslands. Subsequent studies have validated initial findings of the type of flora and fauna of the corridor. Biologists from the Department of Natural and Environmental Resources and the Fish and Wildlife Service have walked the corridor and validated the initial findings. In 2014 they requested a more detailed study to corroborate if there was the presence of Species on the federal list of Rare or Endangered Species and the results were negative. Both agencies certified the validity of these determinations through letters to that effect. See EA Attachment 11.

e. Answer: Hydrological-Hydraulic studies fully comply with current regulations and are suitable for this type of analysis and many have been carried out and updated after 2016. These studies will be reviewed and updated in the final design phase of the project, a process that will begin after the environmental process is completed, in accordance with current federal regulations. The models have the ability to model recurrence periods of events such as those that occurred during the passage of Hurricane Maria. Recurrence periods of a frequency of 100 years were considered during the study and the results reflect that the bridge structures will not have a significant effect on flood levels nor will the proposed structures be affected by events of that frequency. At the end of last year, the ACT modified its requirements to increase the recurrence periods in the evaluation of structural elements for bridges and other hydraulic structures and thus temper them to these atmospheric events.

f. Answer: The permanent and temporary effects of wetlands were assessed and will be reflected in the EA. Section 5.3 of the EA outlines mitigation measures to minimize impacts to these resources. The only wetland directly and permanently affected already has the permission of the Corps of Engineers, who determined that the construction of the bridge will not have significant impacts on this resource if the measures included in the permit are taken.

	<p>Recommendations:</p> <p>1. Desist from building more segments of the PR-10 and reallocate the separate funds to strengthen the network of secondary and tertiary roads that adjust to the natural variability of the contours of the elevation of the land.</p> <p>2. Carry out a new study of flora and fauna.</p> <p>3. Conduct a new comparative study of potential alternatives, taking into account advances in construction techniques, and including the option of making substantial improvements to the existing PR-123 (geometric improvements in sections of sharp curves or unstable slopes to make</p>	<p>Answer: Your comments and recommendations have been noted and will be taken into consideration during the final EA review and preparation of the proposed action. The decision to build this road was made a long time ago after multiple processes that had public participation. The purpose of this process is to determine environmental compliance in order to raise additional funds for the construction of the portion of the project that remains to be built. The process to give an opinion on a component of the intermodal transportation system is through the public participation processes of the Metropolitan Planning Organization attached to the Department of Transportation and Public Works Transportation (MPO). The funds requested are federal funds that cannot be used to address other problems in the transportation system.</p> <p>2. Answer: Your comments and recommendations have been noted and will be taken into consideration during the final EA review of the proposed action. The need for an updated inventory would be important, among other things, to determine the compensation of the project for the loss of housing and other mitigation measures. The mitigation of the proposed action has already been agreed upon after biologists from the Department of Natural and Environmental Resources conducted field studies. It consisted of the acquisition and transfer of a farm near the Río Abajo Forest known as Hacienda El Verde with a capacity of 370.23 cuerdas, of which 117 cuerdas are to compensate for the construction of two sections of the PR-10 to the intersection with the PR-123 and 253.23 cuerdas are to compensate for the construction of this project. This mitigation was already completed in 2021. See EA Attachment 24. Like any dynamic process, there is the possibility of changes in the area over time. The protocols agreed with the agencies that regulate this matter are aimed at detecting these possible changes before the start of construction of the project in accordance with the provisions of the same and taking the appropriate measures for the protection of these resources, all in agreement and collaboration of the agencies with jurisdiction in this matter.</p> <p>3. Answer: Your comments and recommendations have been noted and will be taken into consideration during the final EA review of the proposed action. The PRHTA recently conducted an evaluation of alternatives to improve the existing road. To do this, the 59 curves that exist in that section of approximately 14 kilometers long were evaluated. The radii of curvature were calculated</p>
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		<p>them passable for trucks and buses, and safer during significant rainfall events).</p>	<p>and the visibility distance of each of them was calculated for a speed of 25 mph. Only one met the minimum safety requirements required. Studies in the area have determined that the opportunity to build runoff control structures in that corridor is limited, so the possibility of future landslides along that stretch of PR-123 cannot be effectively diminished. The limited space of the easement would require the displacement of families adjacent to the road for its expansion. Managing traffic in that limited space would aggravate traffic flow.</p> <p>Another evaluated alternative that had previously been discarded is to build a new route east of the Rio Grande de Arecibo. The original route affected the mountainous area and the forested area east of the Rio Grande de Arecibo. On this occasion, the alignment was established closer to the banks of the Rio Grande de Arecibo to minimize the impacts on the mountainous area and improve its viability. It consists of the construction of 5 viaducts, 3 bridges and 2 tunnels of 685 meters and 375 meters respectively. The cost of this alternative is \$978,203,433. It would require the displacement of most of the residences along PR-123, as well as the impact on the Rio Grande de Arecibo would be greater during its operation. Based on the above, it has been determined that there are no other viable alternatives to meet the need of the project and its purpose.</p>
45	Non Government Organization	<p>1) The EA does not consider or analyze the problem of sediment in this construction.</p>	<p>1) Answer: The Environmental Assessment Factor section in the subsection of 5.2.1 Land Development discusses the topics of / Soil Suitability/Erosion/Drainage/Storm Water Runoff of the EA presents the mitigation measures that will be taken for the erosion and sedimentation control of the project. In the DIAF of PR-10, in the Soil Impact, Geology and Topography Section on page 64, it was already anticipated that this area was the most susceptible to landslides due to its geology and type of soils. The proposed design contemplates the installation of berms in the fills and the installation of nails in the cuts to handle the issue of soil stabilization and avoid landslides at the points throughout the project that have been detected to be the most susceptible to this type of situation.</p> <p>In terms of the erosion estimates that will be generated in the project stage, it will depend on the final design that is provided, in which the cuts and fills will be defined, the inclination that will be given to them, the length of the inclination and the temporary and permanent structures for the control of runoff water and structures for the control of erodible material such as terraces, channels with rock linings and dissipators of runoff energy. The same situation occurs with erosion during the operation of the project, which will be of lesser amount since the</p>

road built will already have runoff control structures, the stabilization of the slopes through the construction of terraces and other structural measures explained above for the control of erosion and landslides, as well as the revegetation of the exposed areas.

It must be taken into account that the erosion and sedimentation control plans are dynamic in the sense that they must be varied and modified as the construction of the project progresses and the elevations of the land vary with the movement of cuts and fills, their inclination and the area of exposure of erodible material. Preliminary estimates indicate that, in a hypothetical scenario of a more critical condition, in which all soils in the area of the proposed action are exposed to erosion, the annual sediment contribution of the project would be around 890.36 cubic meters annually, which would represent a contribution of 0.17 percent of all the annual sediment generation in the basin. The project will be built progressively, and the parts exposed to erosion at any given time represent less than 20% of the length of the project. For this reason, the sedimentation potential is much lower than what has been previously expressed, which is estimated at this time at approximately 150 to 175 cubic meters.

In relation to the recommendation to make mathematical estimates, it must be considered that, in linear projects such as the construction of a road, the levels of the site, as well as the exposed areas, change continuously as construction progresses. More dynamic changes occur in an area where the topography is steep and the levels of cuts and earth fills, as well as the length and steepness of slopes are constantly changing. Therefore, it is advisable to defer mathematical calculations after the final design drawings are completed, when more accurate data of existing site elevations is available before and after the project is completed. Other important information obtained from the final design drawings are the elevation of the road, the final slope of the length and slope of cuts and backfills, the location of drainage during project construction and during road operation, measures for the stabilization and restoration of exposed areas, and the location and type of erosion control structures.

2) The EA does not address the cumulative problem of sedimentation in the basin.

1. The EA does not disclose the magnitude of the environmental effects of the

2) Answer: The cumulative impacts of the project are discussed and analysed in section 5.4.2.5. In general terms, the impact of the proposed action in relation to the impacts of other sources that contribute to sedimentation in the basin is not significant. The area of the basin is approximately 103,761 acres and approximately 523,640

construction of PR-10. The 109-page EA superficially seems to touch on all of the environmental concerns associated with building a highway through some of the steepest and wettest terrain in Puerto Rico. We have identified this type of narrative in EAs that seek a (Finding of No Significance Impact) FONSI while ignoring critical environmental impacts. For example, the EA explains federal regulations and how they will be addressed, it is stated that the project contains all federal and Puerto Rico agency endorsements, and that it meets regulatory requirements for floodplains, wetlands, federal wildlife, water quality (excluding sediment), explosives, noise, and others. However, local environmental laws and regulations are not included. We share with you three quotes from the EA that summarize how the proponent agencies propose to address the most serious environmental hazard facing PR-10 construction and why they are incomplete:

3) P 70. "Construction projects, such as the one discussed in this report, generate significant amounts of sediment and debris that, if not properly managed, can contaminate stormwater runoff." While this statement is true, it unfortunately falls short of the potential impacts of sediment generated by PR-10 construction. An EA applying for a FONSI should include the amount of sediment and debris generated by the project as part of the determinations. In addition, we would expect to see in detail how this sediment and debris will be managed to avoid water pollution especially in the increases that would need to be incurred during extreme natural events (such as hurricanes and telluric movements) that generate landslides and more sediment.

cubic meters of sediment are generated annually, representing a contribution per acre of approximately 5.05 cubic meters annually. The impact area of the proposed action is approximately 209 acres, which represents .20 percent of the total area of the basin, and currently contributes approximately 1,055 cubic meters annually. After the project is built, the impact area is reduced to 176.31 acres and the sediment contribution is reduced to 890.36 cubic meters annually. This would represent a contribution of 0.17 percent of the sediments generated by the basin annually. It is one of the objectives of the PRHTA to reduce erosion as much as possible, so there is a commitment to take additional measures together with the Department of Natural Resources and Environment to carry out initiatives to reforest and revegetate the easement area of the project to minimize the potential for erosion of the surrounding areas. To this end, the acquired area is approximately 792 acres, while the easement area of the project is approximately 36 acres.

3) Answer: In terms of the erosion estimates that will be generated in the project stage, it will depend on the final design that is provided, in which the cuts and fills will be defined, the inclination that will be given to them, the length of the inclination and the temporary and permanent structures for the control of runoff water and structures for the control of erodible material such as bales of hay, channels with rock lining, and energy dissipators from runoff. The same situation occurs with erosion during the operation of the project, which will be of lesser amount since the road built will already have runoff control structures, the stabilization of the slopes through the construction of terraces and other structural measures explained above for the control of erosion and landslides, as well as the revegetation of the exposed areas. It must be taken into account that the erosion and sedimentation control plans are dynamic in the sense that they must be varied and modified as the construction of the project progresses and the elevations of the land vary with the movement of cuts and fills, their inclination and the area of exposure of erodible material. To ensure the effectiveness of these measures, a detailed Monitoring Plan will be implemented. This plan encompasses the continuous monitoring of the Erosion

Control Plan and Best Management Practices (BMPs) throughout the project life cycle. In addition, regular monitoring of the water quality of the Rio Grande de Arecibo will be carried out to identify any potential impacts of construction activities. Compliance with both federal and local regulations will be guaranteed, with the contractor responsible for executing the plan and the Puerto Rico Highway and Transportation Authority (PRHTA), as sponsor of the project, in charge of supervising faithful compliance with the regulations that regulate this matter.

Other actions that have been taken or will be taken to minimize erosion of the project into water bodies consist of the following:

- a. Approximately 33% of the length of the project are bridge structures (20 in total).
- b. The area exposed during construction will be controlled and represents less than 1.67 kilometers per year.
- c. The construction of embankments in the project has been reduced to the minimum necessary.
- d. Most of the sections in sections III to V are composed of rock material.
- e. The controlled discharges that may reach the Rio Grande de Arecibo in the section that begins south of the project, from the intersection with PR-10 to the section parallel to the Lake Adjuntas Dam, will not exceed 50 NTU and the majority would be retained by the dam and would not pass to other segments of the Rio Grande de Arecibo, reducing the project's sedimentation impact potential of other important resources downstream of the Rio Grande de Arecibo.
- f. During the design phase, additional measures will be provided to minimize the potential for erosion and landslides, such as:
  - i. The slopes of the cuts near the road will be reduced.
  - ii. The lengths of runoff slopes on the surface of these cuts will be reduced.
  - iii. The velocity of the project's runoff water will be controlled and reduced.
  - iv. Terraces will be constructed in some cuts to reduce the speed of runoff for proper management.
  - v. Exposed areas should be reforested and revegetated as soon as possible.
  - vi. Runoff water shall be managed to reduce its speed of runoff, reducing its erosive impact. Discharges will be disposed of in an orderly manner and in accordance with current regulations.

4) P 71 of the EA. "Before beginning construction activities, the contractor must meet two specific conditions: • Obtain coverage under the 2022 General Construction Permit (PGC) issued by the EPA. This involves filing a Notice of Intent (NOI) with EPA at least fourteen (14) days prior to beginning construction activities. Filing the NOI requires a SWPPP prepared and duly signed by the responsible parties. • Obtain a Single Incidental Permit (PU) from the OGP of Puerto Rico. The PUI includes an Erosion and Sedimentation Control Plan for the project, similar but not identical to the SWPPP." This approach to the environmental issue does not address or prevent the adverse effects of this project because it simply relieves the responsibility of contractors, who have the burden of acquiring permits and complying with laws and regulations. This approach to the environmental issue does not address or prevent the adverse effects of this project because it simply relieves the contractors, who have the burden of acquiring permits and complying with laws and regulations, of responsibility. contractors, who have the burden of acquiring permits and complying with laws and regulations. Any non-compliance by contractors exposes the public and the environment to the serious consequences of excessive sedimentation and landslide erosion. We are surprised that government agencies would abandon the public interest of such magnitude. Moreover, the strategy of delegating to private contractors the responsibility for maintaining environmental quality sidesteps the environmental issue and adds neither substance nor justification to the discussion leading to a FONSI.

5) P 74. "7. Qualified geotechnical, transportation, and civil engineers, as well as other relevant professionals, such as environmental professionals and geologists, will join the team to ensure that the design, construction, and maintenance

4) Answer: The above description constitutes what is required by the local and federal regulations that regulate this matter. However, both the owner of the work and the contractor and any other professional in charge of compliance with them must faithfully comply with the provisions of the regulations in force.

5) Answer: The technical team used to collect, analyze and discuss the impacts on environmental resources of this project included professionals from all these branches. As a continuous and integrated effort, these professionals will continue to work in the other phases of the project development process. Current regulations do

of the road follow best practices and meet safety standards. Their expertise will help conduct detailed geological studies, analyze slope stability and recommend appropriate mitigation measures to be considered in the design and construction phase of the project.”

This type of language implies that the proponents recognize that there is a need to include a technical team to assess, determine and mitigate environmental and safety damages beyond those that were performed for this EA. We understand that delegating to the future the tasks that need to be performed to ensure a safe highway and healthy environment is not an action. As written, the EA is based on promises for the future and not on an objective analysis of environmental impact. In addressing landslides along the PR-10 alignment, the EA displays a landslide map and appears to celebrate that, according to the map, fewer than 25 landslides occurred in its project area. No other effort is made to validate the map, describe the size and frequency of the landslides or their potential to disrupt construction or operation and maintenance of the road. In fact, the EA completely ignores the issue of sediment production (other than the 3 citations above). However, this issue has the potential to affect water quality in the region and even influence coastal systems through discharge from the Rio Grande de Arecibo. The agencies that prepared this EA have the information required to estimate the potential sediment production from construction. The information is included in the geotechnical reports attached to the EA. The reports illustrate the level of cuts and fills necessary to complete PR-10. The volume of sediment could be estimated from these reports and an analysis of the effects such levels of sedimentation would have on the river channel, river water quality, estuary and coastal systems could be performed, especially during extreme natural events when sediment is expected to move downslope in high concentrations. Two of

not allow other phases of a road project to be advanced until the environmental process is completed. Once this phase is completed, the road design phase will continue in which the final elevation of the road, the final cuts and fills, the bridge structures that will finally be built and their length, the drainage and runoff control structures, the inclination and length of the cuts and slopes of the road will be defined. erosion and sedimentation control measures during the construction and operation of the project, as well as other important elements involved in the construction of a road. Your comments and recommendations have been noted and will be taken into consideration during the final EA review and preparation of the proposed action. The public participation process complies with the Public Participation requirements of the current environmental federal regulations as established by the CEQ and has had the active participation of hundreds of citizens throughout the process. The agencies involved in the proposed action are relying on the public notice requirements as the means of public participation. Ineffectiveness of the proposed project to achieve the desired objectives. All previous and new mitigation required by federal, state and local governments will be enforced.



the most compelling shortcomings of this EA is that 1) it does not consider or analyze the sediment problem in this construct and 2) it does not address the cumulative problem of watershed sedimentation.

6) The EA also does not take into account that the presence of roads increases the frequency of landslides (results published by the USGS). The public and the EA development process deserves and requires such discussion given the enormous costs of this road (\$60 million per kilometer). The cost of road repair and maintenance after a hurricane or extreme rainfall (common events in Puerto Rico)

6) Answer: There are extensive studies on this subject, mainly by Carlos E. Ramos Scharron. This scientist has studied the issue for years and has determined that the greatest contribution to this effect is the unpaved roads that give access to coffee farms. Another source identified is abandoned coffee farms and those in use that do not properly manage runoff. There is a portion of main and secondary roads that do not exceed 5% in the contribution of erosion. However, the proposed action, unlike all those roads, will have runoff control structures for their proper management and the reduction of erosion during their operation. The costs of the project are directly related to efforts to reduce outages and minimize earthwork to the greatest extent possible and are aimed at minimizing and controlling the environmental impacts previously expressed in your letter and others of a similar nature. Landslides in this region are mainly associated with agricultural uses and access roads that are mostly unpaved and without structures for the management and control of runoff. See Land Disturbance effects of roads in Runoff and Sediment Production on Dry Tropical Settings, Carlos Ramos Scharron et al., 2018. Runoff control, reduction of runoff velocities through the construction of terraces to reduce erosion and sedimentation of slopes and slopes, as well as other runoff management and control structures for proper disposal to be carried out in this project, as described in the EA in Sections 5.2 and 5.3 of the document, reduces the probability of this type of event in the area of the proposed action. For landslide control, berms will be built in the fills and nails will be installed on the slopes to reinforce the ground cuts.

Annual maintenance costs for a 20-year period are currently estimated at \$375,000 annually, totaling approximately \$7,500,000. Costs include: • Regular Road maintenance: \$70,700 • Bridge maintenance: \$126,500 • Landslide and erosion control: \$114,000 • Drainage system maintenance: \$38,000 • Other maintenance activities: \$25,200

During the design phase of the project, a detailed Operations and Maintenance (O&M) Plan will be developed, which will include schedules, personnel projections, funding sources, and infrastructure management details. Long-term funding for O&M will

7) Evaluation of alternative courses of action, - sedimentation of the Rio Grande de Arecibo watershed, - expected landslide frequency and their effects on the environment, - and cost estimates to overcome the effects of landslides and keep RP-10 open. This analysis should lead to an objective cost/benefit analysis of the project and its alternatives.

8) The EA presents an environmental impact scale to evaluate various aspects of the project is worrying.

Although used on several occasions, the environmental impact scale is not formally defined in the EA. The reader is not told what the range of effects considered by the scale is, nor what procedure is used to arrive at a particular level on the scale. We do not know what the type of scale is. Is the scale linear, logarithmic or exponential? The use of the scale is not consistent in the EA. Only two scale numbers appear (level 2 and level 3). Level 2 means no impact. Level 3 on page 79 is a minor and expected impact. Level 3 on pages 74 and 75 is minor adverse impact. How should a reader deal with these inconsistencies? This scale has a high level of subjectivity in addressing the

be integrated into the PRHTA and DTPW budgets. The plan will also address the risks of climate change and other environmental factors through ongoing risk assessments and updates.

7) Answer: The design of the action will be effective in reducing the risk of landslide damage and loss of service along the new road. Maintenance costs take into account the recurrence period of these events, which are currently calculated in a range of 3 to 8 years. The proposed measures will minimize these events since they take into consideration elements of runoff control management and erosion control elements that have not been carried out in other projects. The land east of the corridor has been acquired by the agency, which allows it to control future uses, take additional mitigation measures such as reforestation and construction of measures to reduce the force of runoff and its proper management in a way that minimizes the saturation of the land. We look forward to the collaboration of state and federal agencies and organizations like yours in this effort. The proposed project has undergone financial scrutiny, using Caltrans' Cal-B/C version 8.1 model, adapted for Puerto Rico, in line with U.S. Department of Transportation guidelines for cost-benefit analysis. The results of this are that the project reflects financial returns and addresses critical infrastructure needs, taking advantage of its economic benefits to exceed its costs.

8) Answer: The U.S. Department of Housing and Urban Development (HUD) uses specific nomenclature and criteria to rate the impacts of proposed actions under its environmental review processes, guided by the National Environmental Policy Act (NEPA) and other related regulations. This rating system is designed to evaluate and categorize the environmental impacts of housing and urban development projects, ensuring that they are sustainable and meet federal environmental standards. HUD employs a rating system that includes the following categories:

- a. No Impact: The proposed action will not result in any significant environmental changes.
- b. Minor Impact: The proposed action will have minimal and manageable environmental effects.
- c. Moderate Impact: The proposed action will have noticeable environmental impacts that may require mitigation measures.
- d. Significant Impact: The proposed action will have substantial environmental effects that need thorough analysis and extensive mitigation strategies.

	<p>environmental impacts of the road. The EA should assure the public that the treatment of adverse effects is backed by their (the agencies) commitment to do the right thing. Unfortunately, this scale does not provide assurance to the public.</p> <p>Finally, we believe that the EA is inadequate to support or justify a FONSI. It lacks the information necessary to evaluate the critical environmental issues affecting the project and those causing the project.</p> <p>Heavy rains and landslides will continually affect PR-10. Instead of addressing the arguments that would justify a FONSI, the EA delegates to private contractors the government's responsibility to plan for and address and mitigate the problems with landslides and sedimentation that are sure to occur.</p> <p>Because the EA is deficient in identifying environmental impacts, it cannot be used to ensure that no damage to the environment will occur. We reiterate that an EIS is needed to conduct an up-to-date, comprehensive, and objective evaluation of the environmental impacts and course of action alternatives for this section of PR-10. Among those impacts, the EIS should include:</p> <ul style="list-style-type: none"> <li>-the evaluation of alternative courses of action,</li> <li>-the sedimentation of the Rio Grande de Arecibo watershed,</li> <li>-the expected frequency of landslides and their effects on the environment,</li> <li>-cost estimates to overcome the effects of landslides and keep PR-10 open.</li> </ul> <p>This analysis should lead to an objective cost/benefit analysis of the project and its alternatives.</p>	<p>The categories are simple and easy to understand, making them accessible to both professionals and the general public. This clarity helps to effectively communicate potential environmental impacts. The range from "No Impact" to "Significant Impact" covers the entire spectrum of potential environmental effects. This comprehensive classification ensures that all potential impacts are considered and evaluated.</p> <p>The inclusion of mitigation requirements in the categories of "Moderate Impact" and "Significant Impact" underscores HUD's commitment to addressing and minimizing adverse environmental effects. This focus on mitigation is crucial for responsible environmental management. The system allows for nuanced assessments. For example, projects that initially fall into a higher impact category can be moved to a lower category if effective mitigation measures are proposed and implemented.</p> <p>HUD's qualification criteria align with the requirements of NEPA and other federal environmental regulations. This ensures consistency in environmental impact assessments across different federal agencies and programs. The ratings provide a clear framework for decision-making, helping HUD officials, project planners, and developers understand the level of environmental scrutiny required and the steps needed to mitigate impacts.</p> <p>Based on the above, HUD's nomenclature for rating the impacts of proposed actions is generally adequate and effective in guiding environmental reviews. It balances clarity, comprehensiveness, and regulatory alignment, making it a useful tool for assessing and mitigating environmental impacts. However, there is room for improvement in terms of specificity, public participation, and regular updates to ensure that the system continues to meet contemporary environmental challenges.</p>
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46	Private Citizen	<p>A. There has been no scientific evaluation of the need for Highway 10. There has been no information on how many people live along Highway 123, nor has there been any information on the daily traffic in both directions between Adjuntas and Utuado. Residents of Adjuntas predominantly travel to Ponce for health, shopping and public services. Residents of Utuado make similar trips to Arecibo.</p> <p>B. The reduction in the population of Utuado and Adjuntas since the construction of the new Highway 10 was proposed some 58 years ago has not been taken into consideration.</p> <p>C. Residents of Utuado have reported that the passage of large trucks over certain bridges on Route 123 creates traffic jams that hinder the transit of other vehicles. Gasoline, diesel and liquefied propane gas are transported in many of these trucks. There is or will be a new facility to receive, store and sell liquefied gas in Peñuelas. In the short term, these are some of the economic interests driving the construction of Highway 10 between Adjuntas and Utuado. Mining capital conglomerates and the United States Geological Survey are waiting in the wings.</p> <p>D. The situation to be resolved is not traffic flow, but the width of the bridges with respect to large trucks. The quickest and least costly solution is to widen certain bridges and widen certain curves.</p> <p>The construction of Highway 10 along the proposed route includes 20 bridges, several crossings of the Grande de Arecibo River and creeks, complex and costly landslide</p>	<p>A. Answer: Population data is described in Section 5.1.17 of the EA. Traffic data are described in Section 5.1.13 of the EA, Operational Impacts section, and in Attachment 18.</p> <p>B. Answer: Population and population reduction data were taken into consideration and are reported in the EA, see section 5.1.17 of the EA. They are taken into consideration in the projection of traffic in the future. Considering these data and regional studies on the behavior of the economy, it is projected that in the next twenty years vehicle growth will be 1 to 1.5% per year. On the other hand, the need and purpose of this project is to complete the PR-10 to provide a resilient transportation corridor as a measure aimed at prioritizing risk mitigation, a key asset that in the aftermath of a disaster event will contribute to the resilience of the island.</p> <p>C. Answer: The flow of trucks on this road is high and constitutes one of the main reasons why the construction of the proposed action has a high priority in the 2050 Long-Term Multimodal Transportation Plan. It is also one of the reasons that support the purpose and need of the project as it demonstrates the need to have an efficient and safe transportation element in which these vehicles can travel and that can also be used during emergency events. The proposed pathway will allow for rapid response before, during, and after an emergency. It will also provide a safe and efficient route for the movement of trucks with cargo to attend to an emergency in the northern or southern part of the island.</p> <p>D. Answer: The DIAF of PR-10 ruled out the alternative of No Construction and of improving PR-123 due to the impossibility of bringing the highway into compliance with design standards, the cost of construction, the non-availability of space for the management of vehicular traffic during construction, the inability to adequately manage runoff and control landslides, the need to move residences and businesses along the road and the environmental impacts stem from those caused by the construction of the road. Under this proposed action, it</p>
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	<p>control systems, deforestation, elimination of wildlife habitat, soil erosion, sedimentation of the Grande de Arecibo River and the Dos Bocas reservoir. This is the source of water for the aqueduct that provides service from Arecibo to the Metropolitan Area of Bayamón, San Juan, Carolina, Trujillo Alto, Caguas and Canóvanas.</p> <p>E. It has been indicated that the construction of Highway 10 would take five years and that the traffic of heavy equipment, including the trucks used in the construction, would be along the highway. The severe impact on vehicular traffic during that long period has not been evaluated.</p> <p>F. The cost of the project would be at least \$554.5 million, about \$74 million per kilometer, a waste of public funds, almost all from the Department of Housing. The country needs these funds to repair abandoned structures and build new ones to be used as housing.</p> <p>G. The selected construction route runs along the Rio Grande de Arecibo canyon. On both sides there are steeply sloping mountains that would increase the height of cuts, retaining walls, soil and subsoil erosion, sedimentation of the Grande de Arecibo River and the Dos Bocas reservoir.</p> <p>This river is connected from a small dam by a tunnel to the small Pellejas dam, to the Jordán dam on the Viví River, which supplies water to Utuado, and by another tunnel to the Caonillas reservoir.</p> <p>H. The mountains to the west of the Grande de Arecibo River are high, which increases the amount of rain and runoff to the east. There are a large number of</p>	<p>has been determined that such an alternative is not viable because it does not meet the purpose and need of the project as described in Chapter 3 of the EA. Our analysis of the road shows that the length of this section is approximately twice the proposed action, 12 kilometers, and contains 59 curves, of which 58 of them do not meet the minimum visibility distance according to the design standards for highway projects. It is necessary to take into consideration the condition under which this road was built, at which time there were no vehicles and there were no design standards for road safety.</p> <p>E. Answer: The Construction Mitigation measures, and the clauses and conditions of the Design-Build Contract will provide measures to control the exit and entry of the project. See Section 5.3 of the EA on this matter. Truck access to the project will be through both ends of the project, which connect to PR-10. No impacts are contemplated due to the circulation of project trucks on the transportation routes.</p> <p>F. Answer: The funds to be used come from an infrastructure project section of the CDBG's Mitigation program. This project was selected because of the benefits to the region and to communities with LMI within the region, for improved resiliency during an emergency. Housing funds for housing needs within this region are included in other parts of the CDBG-MIT Program.</p> <p>G. Answer: The impacts of the project on this matter are discussed in the EA in Section 5.2.1. Geotechnical studies are included in Attachment 22. The DNER endorsed them and required as a condition that the recommendations of the geotechnical studies for the management and control of landslides had to be included in the final design of the project. The alignment of the project was planned to minimize outages, which is why approximately 32% of the project is bridge structures. The soils will be with berms and the installation of nails, as well as runoff control terraces to minimize erosion and sedimentation of the project. Soil erosion control measures include the installation of berms for the protection of embankments in fill and nails for sections in cuts.</p> <p>H. Answer: The EA discusses the impact on water bodies and wetlands. Also included are the Hydrological and Hydraulic studies which were evaluated and endorsed by the Department of Natural Resources. See Attachment 23. Erosion and sedimentation control measures are</p>
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	<p>creeks and the Guaonico River, tributaries of the Grande de Arecibo River.</p> <p>I. Given the fact that the construction of this portion of Highway 10 would facilitate the open-pit exploitation of several copper, gold, silver and molybdenum deposits in which sulfur is present, their environmental impact must be included in the Highway 10 EIS. Failure to include them constitutes a fragmentation of the joint environmental impact assessment.</p> <p>Since 1970-1972 we had evaluated a good part of the environmental impacts of open-pit mining in the publication "Puerto Rico and Mining" (1972).</p> <p>J. Its impact included deforestation, soil erosion, sedimentation of streams, the Pellejas, Viví, Grande de Arecibo rivers and the Dos Bocas reservoir. In addition, contamination of soils, microorganisms, vegetation, humans and other animals, with dust from blasting rocks with explosives, transportation of extracted material in the mines and storage areas of tailings or tailings from the concentration of copper, gold, silver and molybdenum.</p> <p>K. It would also generate contamination of streams, rivers, water intakes, the Dos Bocas reservoir, the Caonillas reservoir through the aforementioned tunnels, with acidic waters resulting from the oxidation in the presence of water and oxygen of sulfur-containing compounds such as pyrite, chalcopyrite and molybdenite, among others. These waters would also contain iron, manganese, copper, molybdenum and other ions.</p>	<p>included in Section 5.3 of the EA. The hydrological and hydraulic studies evaluated the runoff of the basin and based on the results, hydraulic structures are recommended for the adequate management of runoff, which are shown in Attachment 23. This information will be taken into consideration in the final design of this project.</p> <p>I. Answer: The issue of fragmentation in transportation projects has nothing to do with what is expressed here. The rules for assessing the impacts derived from the proposed action do not require this type of analysis that is not directly linked to the proposed development and construction. Paragraph (g)(2) of Section 1508.1 provides that a causal relationship of "indirect cause" is not sufficient to render a proposer liable for a particular effect under NEPA. Effects should generally not be considered "if they are distant in time, geographically remote, or the product of a prolonged causal chain." This paragraph also explicitly excludes "effects that an agency does not have the capacity to prevent due to its limited legal authority or that would occur independently of the proposed action." Paragraph (g)(3) explicitly repeals the definition of cumulative impact.</p> <p>J. Answer: See our previous answer which is related to the same topic.</p> <p>K. Answer: See our answer above related to this issue.</p>
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		<p>L. Detailed alternate routes through other locations have not been evaluated and presented. If it were necessary to build such a road, which we doubt, building it through the Juan González and Pellejas de Adjuntas neighborhoods, without crossing the Grande de Arecibo River and crossing fewer streams, would significantly reduce costs and the overall social and natural environmental impact. We include a possible preliminary route through the aforementioned neighborhoods (see Figure 2).</p> <p>Synopsis of mining research history. - For the synopsis of mining research history please see pages 5 to 21 of the document presented by Dr. Neftali Garcia.</p> <p>These are only a small sample of the areas under exploration by the US geological survey. They have included the entire archipelago. The area of 37,000 cuerdas mentioned is one of the central axes of the investigation.</p> <p>M. Highway 10 is an important part of the process of exploration and eventual open pit exploitation of mineral resources in west central Puerto Rico. Its construction without the preparation of an updated Environmental Impact Statement and the broadest public participation constitutes a violation of the most elementary principles and effective methods of protection of the inseparable natural and social components of the environment.</p>	<p>L. Answer: For the proposed action, countless alignments have been evaluated in order to minimize construction costs, the displacement of families, effective control of landslides and other environmental impacts. A lineup similar to the one you include was evaluated as part of one of three corridors evaluated in the DIA-Preliminary. It is much longer than the proposed action, so its cost will be higher than the proposed action. In addition, it would require the displacement of many more families and its earthwork would also be greater than the earthwork of the proposed action.</p> <p>M. Response: The EA complies with current regulations and demonstrates that the impacts previously assessed in the PR-10 DIAF remain substantially unchanged and that the proposed action does not contemplate significant environmental impacts that were not previously assessed in the originally approved DIAF and that the preparation of a PR-10 DIAF Supplement is not warranted. Regardless of the above, the EA alone complies with the purposes of the environmental regulations in force, so its approval and the corresponding determination of Non-Significant Impact of the proposed action are appropriate. The comments received in this process in accordance with the documentation contained in the Attachment evidenced in Attachment 25 demonstrate a broad participation of organizations and the general public in the process.</p>
47	Private Citizen	<p>A. The 2002 Flora and Fauna Study only analyzed approximately 3.6 km (47%) of the proposed route in 2023.</p>	<p>A. Answer: We have taken note of your comment and will take it into consideration in the revision of the environmental document. This comment is similar to the one you submitted to us in the previous process, which appears in Attachment 25, Comment Number 55. Subsequent studies have validated initial findings of the type of flora and fauna of the corridor. Biologists from the Department of Natural and Environmental Resources and the Fish and Wildlife Service have walked the</p>

		<p>B. Page 82 of the EA acknowledges the devastating impact of hurricanes Irma and Maria in 2017 but does not indicate how the conclusions indicated there were reached.</p> <p>C. As the studies have not been updated, it is not possible to establish the current impacts on the flora and fauna currently.</p> <p>D. Documents submitted to the EA detailing the vegetation</p> <p>1. Protocols submitted to the DNER in 2021 - Annex 14. – The protocol presents a general summary of some plants found along the route. There is no methodical field analysis of the flora that indicates the species on the route to be impacted. Sampling locations or sampling type are not shown exactly. Therefore, it does not have the scientific validity to describe vegetation.</p>	<p>corridor and validated the initial findings. In 2014 they requested a more detailed study to corroborate if there was the presence of Species on the federal list of Rare or Endangered Species and the results were negative. Both agencies certified the validity of these determinations through letters to that effect. See EA Attachment 11. The studies were referred to the agencies with jurisdiction in this area, DRNA and FWS, and were validated by them</p> <p>B. Answer: We have noted your comment and were taken in consideration in the revision of the environmental document. The citations were improved for better understanding and readability.</p> <p>C. Answer: The need to have an updated inventory of flora and fauna is important, among other things, to determine the compensation of the project for the loss of habitat and other mitigation measures. The mitigation of the proposed action has already been agreed upon after biologists from the Department of Natural and Environmental Resources conducted field studies. It consisted of the acquisition and transfer of a farm near the Río Abajo Forest known as Hacienda El Verde. This mitigation was already completed in 2021. See EA Attachment 24. Like any dynamic process, there is the possibility of changes in the area over time. The protocols agreed with the agencies that regulate this matter are aimed at detecting these possible changes before the start of construction of the project in accordance with the provisions of the same and taking the appropriate measures for the protection of these resources, all in agreement and collaboration of the agencies with jurisdiction in this matter.</p> <p>D. Answer: We have taken note of your comment and will take it into consideration in the revision of the environmental document. The studies were referred to the agencies with jurisdiction in this area, DNER and FWS, and were validated by them. The compensation made for the construction of two sections of the PR-10 doubled the area impacted by the project. After DNER biologists evaluated the corridor of the proposed action, it was agreed to compensate for an additional 253.23 acres for this project, which means that the compensation made is more than 7 times the impact on the corridor's cabins. Studies subsequent to the one you mention carried out by the DNER validated that the flora and fauna was similar to those previously reviewed in the DIAF and others. The</p>
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2. Comprehensive Inventory of Protected Areas and Other Land Conservation Mechanisms in Puerto Rico of 2019. – This is a geospatial survey using satellite photos. There is no methodical and detailed field analysis of the flora that indicates the species on the route to be impacted. Therefore, it does not have the scientific validity to describe vegetation.

3. Impacts of Hurricane Maria on Land and Convection Modification Over Puerto Rico - Hosannah - 2021 - Journal of Geophysical Research: Atmospheres - Wiley Online Library. - This is another geospatial study using satellite photos where forest cover is analyzed. There is no field analysis of the flora that indicates the species on the route to be impacted. Therefore, it does not have the scientific validity to describe vegetation.

4. Interactive Map of Puerto Rico (<http://gis.jp.pr.gov/mipr>). Through this portal, a series of georeferenced maps that include ecological resources and flora and fauna are made available to the public. These portals are not very reliable because the information is not updated frequently. It should not be used for studies for projects that impact the environment. Therefore, it does not have the scientific validity to describe vegetation.

On page 85 of the EA it is stated; "In relation to the studies, it is important to indicate that most of them have been carried out using remote sensing technology that allows us to observe the state of the before and after of the vegetation by comparing satellite photos. The information has been used by local and federal agencies to develop geospatial maps that can be accessed by agencies and the public for use as a planning tool." This shows that studies are to describe the overall coverage of an area. There is no specific knowledge of the species found on the route to be impacted. Therefore, an Environmental Impact Statement must be made.

2021 letter where they agree to establish protocols recognizes the time that has passed since their studies were done. However, the property agencies have stated that they continuously monitor these areas and obtain relevant information about the species they manage. Given the uncertainty of when construction of the project will begin, and to avoid continued studies in the future, the protocol included in Attachment 14 was agreed. The FWS and DNER have collaborated to develop and agree on protocols with the project sponsor. These protocols are designed to ensure the protection of any rare or endangered species that are discovered before and during the construction of the project. The protocols include measures for the protection and relocation of any species found within the project corridor.

This ensures that the most accurate and contemporaneous information with the project is obtained and shared with the agencies with jurisdiction in this matter before the start of project construction. A firm of biologists will be hired and will be in charge of carrying out control and monitoring points. The project corridor will be subdivided into 62 transects and each transect will be subdivided into monitoring sectors every 10 meters, along the entire length of the project with an approximate width of 100 meters on each side of the central alignment.

E. Environmental Documents detailing Wildlife  
The studies pointed out as evidence of the fauna are

1. Flora and Fauna Study 2002, Quintero. It was previously indicated that this study does not have ecological validity because of the time that has elapsed since it was carried out, 12 years. The reasons are also pointed out.

2. Study of the Forest Guaraguao (*Buteo platypterus brunnesceens*) and Sierra's Guaraguao (*Accipiter striatus Venator*) of 2013-14. The reference of this study and the information or conclusions are not presented. By the date it must be;  
**ENDANGERED SPECIES ASSESSMENT A: Endangered Bird of Prey Species Status AT Highway PR-10 Proposed alignment for Sections III (AC100071) and IV (AC100055), Utuado-Adjuntas, Puerto Rico.** Gabriel Berriz & Associates, Inc. By Laredo Gonzalez, MP, PPL May 2014. - This study only looked at two segments, 4.2 KM km of the four segments and 7.6 KM. In addition, the incorrect use of linear graphs for non-continuous data was found. Nor does it present the possible indirect or cumulative impacts. The study was done 11 years ago and does not take into account the changes in fauna and flora caused by hurricanes, Irma, Maria and Fiona.

3. State of Puerto Rico Wildlife Action Plan: Ten Year Review. "The report was developed by the DNER and the USFWS with the objective of evaluating the progress of a comprehensive strategy for the conservation of Puerto Rico's wildlife resources." The species of flora and fauna found in the project's impact area are not detailed. These studies are not enough to get an idea of the fauna found in the area. That is why it is necessary to prepare an Environmental Impact Statement.

E. Answer: We have taken note of your comment and was considered in the revision of the environmental document. The studies were referred to the agencies with jurisdiction in this area, DNER and FWS, and were validated by them. Please see DNER and FWS letters included in attachment 12. In relation to the fact that the section evaluated only included sections II and IV, this is because only this sector was required for the study to be carried out since it was understood that they were the sections furthest from the existing communities in the area and were the sectors where there were still questions about the existence of species of this type in that sector. Regarding indirect or cumulative impacts, the study did not detect indirect impacts on these species in the area under study. Regarding the cumulative impact, this analysis is only required if other actions that impact the presence of these species are detected in the sections of the corridor included in the study, and no other activities, uses or actions that directly or indirectly affect these species were detected. The documentation reviewed is aimed at demonstrating that the known information about the area has not changed and is in line with the studies that have been carried out so far. On the other hand, and in accordance with current regulations, the reasons given above do not support or justify the preparation of an EIS.

F. Other Considerations—Hiring a Biologist Is Not Enough  
It is intended that a biologist will be present in the field during construction to identify the sensitive species and remove them. As a detailed analysis of the vegetation has not been carried out, the person must have extensive knowledge of endangered species. He must analyze large areas of land daily and analyze the vegetation and animals to fulfill his task. This solution is not recommended because it is humanly impossible to actually carry out this work. For this reason, it is essential that several biologists or ecologists with extensive experience make a detailed study of the flora and fauna as part of an Environmental Impact Statement before starting construction.

G. Citizen Participation has been run over and requests Public Hearings  
For this Environmental Assessment, the appropriate mechanisms for citizen participation have not been provided. No public hearings have been held in the affected region of Utuado and Adjuntas. Nor has guidance been offered to the public on the possible impacts of the project and the alternatives analysed. The process has been very fast and rushed. Moreover, I participated in submitting comments to the Department of Housing on July 16, 2023 in relation to the "Reevaluation of the Final Environmental Impact Statement (FEIS) (24 CFR PART 58) Draft construction of PR-10 Adjuntas to Utuado, Puerto Rico – June 2023". I did not receive notification from the Department of Housing that an AED had been prepared. It is important that public hearings be held as required by NEPA regulations and that the comment period be extended by at least 60 days so that the public and the scientific community can make appropriate recommendations.

H. Preparers of the Environmental Assessment In the group of preparers of this Environmental Assessment there are

F. Answer: We have taken note of your comment and was considered into consideration in the revision of the environmental document. We agree with their assessment and the hiring is intended to be an interdisciplinary team of biologists specialized in the identification of species of flora and fauna, as well as their proper management and protection.

G. Answer: We have taken note of your comment and will take it into consideration in the revision of the environmental document. Public participation in the two consultation processes carried out has had broad and robust participation. Attachment 25, evidenced by submitted comments representing approximately 162 entries and comments from the public and organizations with an interest in the proposed action, demonstrates broad and effective participation in the process. The feedback received for this EA has also demonstrated effective participation. The holding of a public hearing in this type of process is not mandatory and is currently considered unnecessary.

H. Answer: We have taken note of your comment and will take it into consideration in the revision of the environmental document. The process for the preparation

	<p>no biologists, ecologists, planting professionals, geologists, archaeologists or hydrologists.</p> <p>I. Other Species This Environmental Assessment emphasizes the possible impacts on endangered species and therefore does not analyze other species in more detail. For example, amphibians are not mentioned.</p> <p>In the project area there are four species of Coquí that, although Comments EA February 2024 PR-10 Utuado – Adjuntas Héctor Quintero Vilella MS. PhD. Departamento de la Vivienda 18-04-2024 6 have not yet been catalogued as endangered, a significant reduction in population size has been detected in recent years (Dr. Rafael Joglar, personal communication). These species are the Mahogany Coquí, Cricket Coquí, Mountain Coquí and Melodious Coquí.</p>	<p>of this EA has required the preparation of environmental studies prepared by specialists in each of the branches in which environmental impacts on resources are analyzed and discussed. They provide information as necessary for the drafting of this EA. The comments you have made for this document were referred to a biologist with experience in the development and impact assessment of transportation projects who contributed to the response to them. The interdisciplinary team will continue to expand in the next stages of the development of the proposed action in order to have the necessary personnel for the Environmental re-evaluations in the design and construction stages, as well as during its operation.</p> <p>I. Answer: We have taken note of your comment and will take it into consideration in the revision of the environmental document. The 2014 wildlife survey listed amphibians detected in the project area during the study period. The studies to be carried out during the design and construction phase are aimed at trying to determine the presence of amphibians and other important species that may currently inhabit the corridor of the proposed action.</p>
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