

## **APPENDIX B: AGENCY CORRESPONDENCE**





# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Boqueron Field Office  
P.O. Box 491  
Boqueron, Puerto Rico 00622



JAN 03 2007

Mr. Kevin S. Rose  
U.S. Department of Transportation  
Federal Highway Administration  
21400 Ridgetop Circle  
Sterling, VA 20166-6511

RECEIVED  
2007 JAN -8 PM 3:45  
EASTERN FEDERAL LANDS  
HIGHWAY DIVISION  
STERLING, VA

Re: FHWA Project RRP-SOP 10 (1)  
Upgrade Tranburg Road and rehabilitate  
four parking areas within Sandy Point NWR,  
St. Croix, USVI

Dear Mr. Rose:

Thank you for your letter of December 6, 2006, requesting information regarding federally-listed species in the project area and possible adverse effects, if anticipated. Our comments are provided under the Endangered Species Act (87 Stat. 884, as amended; 16 United States Code 1531 et seq.).

Based on the information provided, the proposed project consists of the upgrade of approximately 2.2 miles of Tranburg Road establishing a consistent width of 12 feet and improving drainage to alleviate the rutting and potholing. All roadwork will be conducted within the existing roadway area and all clearing and grading will occur within previously disturbed areas. Parking lot upgrade will consist of placing new aggregate and disturbance of new areas are not anticipated.

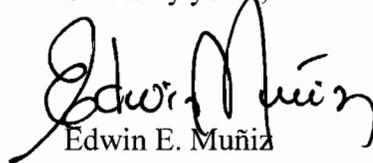
The project site is located within the Sandy Point National Wildlife Refuge which is designated critical habitat of the endangered leatherback sea turtle (*Dermochelys coriacea*). Additionally, the refuge harbors habitat for the endangered hawksbill sea turtle (*Eretmochelys imbricata*), brown pelican (*Pelecanus occidentalis occidentalis*), the threatened green sea turtle (*Chelonia mydas*) and the endangered plant *Buxus vahlii*. However, based on the information provided, characteristics of the site and the nature of the project, we believe that the proposed activities are not likely to adversely affect threatened and endangered species located in the refuge. Should additional information on listed or proposed species become available, this determination may be reconsidered.

Mr. Rose

2

If you have any questions, please call Marelisa Rivera at 787-851-7297 extension 231.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Edwin E. Muñiz". The signature is fluid and cursive, with the first name "Edwin" and last name "Muñiz" clearly distinguishable.

Edwin E. Muñiz  
Field Supervisor  
Caribbean Field Office

Mtr

CC: Susan Silander, CINWR  
Mike Evans and Claudia Lombard, SPNWR

2



# United States Department of the Interior

## FISH & WILDLIFE SERVICE

### Boqueron Field Office

Carr. 301, KM 5.1, Bo. Corozo

P.O. Box 491

Boqueron, PR 00622

AUG 27 2008



Mr. Kevin S. Rose  
U.S. Department of Transportation  
Federal Highway Administration  
21400 Ridgetop Circle  
Sterling, VA 20166-6511

2008 AUG 29 PM 1:47

RECEIVED

Re: FHWA Project RRP-SOP 10 (1)  
Road and parking Rehabilitation on Sandy  
Point NWR, St. Croix, USVI

Dear Mr. Rose:

Thank you for your letter of August 8, 2008, providing updated information regarding the above-mentioned project and requesting additional comments regarding federally-listed species in the project area and possible adverse effects, if anticipated. Our comments are provided under the Endangered Species Act (87 Stat. 884, as amended; 16 United States Code 1531 et seq.).

We reviewed this project in 2007 and determined that the proposed activities were not likely to adversely affect threatened and endangered species located in the refuge. The Sandy Point National Wildlife Refuge is designated critical habitat of the endangered leatherback sea turtle (*Dermochelys coriacea*) and harbors habitat for the endangered hawksbill sea turtle (*Eretmochelys imbricata*), brown pelican (*Pelecanus occidentalis occidentalis*), the threatened green sea turtle (*Chelonia mydas*) and the endangered plant *Buxus vahlii*. Based on the new information provided, the proposed project was modified to provide parking spaces along Tranberg Road, improve road conditions of the existing Tranberg Road, relocate approximately 900 feet of Tranberg Road onto the refuge and create a connecting segment at the existing terminus of Transberg Road to facilitate emergency vehicle passage. All the proposed activities have been coordinated with staff from our Refuge Division.

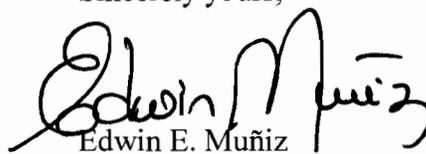
Based on the new information provided, characteristics of the site and the nature of the project, we continue to believe that the proposed activities are not likely to adversely affect threatened and endangered species located in the refuge. Should additional information on listed or proposed species become available, this determination may be reconsidered.

Mr. Rose

2

If you have any questions, please call Marelisa Rivera at 787-851-7297 extension 231.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Edwin E. Muñiz". The signature is fluid and cursive, with a long horizontal stroke at the end.

Edwin E. Muñiz  
Field Supervisor  
Caribbean Field Office

Mtr

CC: Susan Silander, CINWR  
Mike Evans and Claudia Lombard, SPNWR

2



## Cooperative Extension Service

June 27, 2008

Mr. Eric B. Beightel, Environmental Protection Specialist  
U.S. Department Of Transportation  
Federal Highway Administration  
21400 Ridgetop Circle  
Sterling, VA 20166-6511

Dear Mr. Beightel:

These comments are in reference to the road and parking improvements at Sandy Point National Wildlife Refuge. First of all, I would like to thank you for the public hearing of June 25, 2008. I appreciate the public forum where the residents of St. Croix had the opportunity to give their inputs on the proposed Tranberg Road improvement. As I discussed with you at the public hearing of June 25, 2008, it would be great if a bridge could be constructed at the section where the salt pond water meet the road on the southeastern section of the refuge. On the sheet index your agency provided to me, it is sheet D6 where the proposed embankment is to be built.

This section of the road is a nesting site for the threatened species the least tern ( *Sterna albifrons*). I am afraid, as sheet D6 describes in the proposed Tranberg Road improvement it would greatly impact the nesting site of the birds. According to *A Guide to the Birds of Puerto Rico and the Virgin Islands* by Herbert A. Raffaele, "It has been recorded in every month except January, but is only found regularly from May-August. It generally occurs in calm waters, often not far from the flats where it breeds."

Another point we discussed at the public hearing is the identification of endangered or threatened plants species along the Tranberg Road. You assured me that these plants will be tagged. If you need my assistance as to the identification of the plants, I am willing to assist your agency. According to the sheet index # 18 roads will be closed off using large rocks. I would suggest using telephone poles across the road that would not be in use. It is more aesthetically pleasing environmentally than large rock.

I am looking forward to working with you on this important project.

Sincerely,

Olasee Davis  
Ecologist/Natural Resources

RECEIVED  
2008 JUL -3 PM 1:22  
EASTERN FEDERAL LANDS  
HIGHWAY DIVISION  
STERLING, VA



GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES

DEPARTMENT OF PLANNING AND NATURAL RESOURCES

DIVISION OF FISH AND WILDLIFE

45 MARS HILL

FREDERIKSTED, ST. CROIX, VI 00840

PHONE: (340) 773-1082, FAX: (340) 772-3227

29 April 2008

Mr. Eric B. Beightel, Environmental Protection Specialist  
U.S. Department of Transportation  
Federal Highway Administration  
Eastern Federal Lands Highway Division  
21400 Ridgetop Circle,  
Sterling, VA 20166-6511

EASTERN FEDERAL LANDS  
HIGHWAY DIVISION  
STERLING, VA

2008 MAY -7 PM 1:25

RECEIVED

**RE: Sandy Point National Wildlife Refuge Proposed Road and Parking Lot Improvements**

Dear Mr. Beightel:

Thank you for the opportunity to provide early comments on the potential environmental impacts to resources on the Sandy Point National Wildlife Refuge (SPNWR), St. Croix, due to proposed road and parking lot improvements.

Without a prepared Environmental Assessment (EA) to assist us in the exact location of sensitive species in relation to the activity proposed, only general comments can be made at this time, which should be further addressed in the EA.

The timing of construction activities at SPNWR is critical in abating impacts to sensitive species. SPNWR was established to protect critical habitat for three nesting sea turtle species, two federally endangered species (leatherback and hawksbill sea turtles) and one federally threatened species (green sea turtle). Extensive roadwork should be avoided at SPNWR during the nesting and hatching periods. All work should be limited to daylight hours between 8:00 am and 4:00 pm. Similarly, several important bird species nest at Sandy Point and may be affected by construction. Most of them nest during the sea turtle season so this should not place an additional burden on construction. Birds of concern include, but are not limited to, Least Terns, White Crowned Pigeons, and Wilson's Plovers.

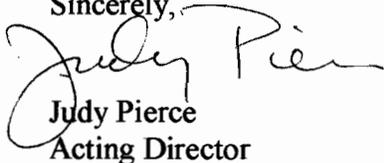
The areas of construction will require diligent monitoring. The West End Salt Pond is a very important habitat for many bird species. Extreme measures should be taken to minimize impact from sedimentation or other pollutants, noise, or destruction of vegetation used for roosting or nesting. Fugitive dust that may be generated by the proposed project must be controlled. An endangered species of plant is found on Sandy Point (Vahl's Boxwood), but it does not appear that the roadwork will affect the stand. However, care should be taken to avoid damaging this valuable and endangered plant through storage of construction materials and equipment or any other activities that may cause a negative impact. Any other endangered plants should be identified and similar care taken with those species.

The EA should contain but not be limited to the following:

1. A soils and hydrology study.
2. An erosion and sedimentation control plan (ESCP) with devices sized to accommodate 100-year rainfall events.
3. A chronological history of past land use patterns at the SPNWR, which includes use of the area for sand mining and land alterations to enable access.
4. Information regarding the formation, ecology and water quality characteristics of the West End Salt Pond.
5. A terrestrial study to determine wildlife use and plant associations found at SPNWR.

As the territorial agency responsible for the conservation and management of marine and terrestrial resources, the Division looks forward to assisting the U.S. Fish and Wildlife Service in the review of the planned road improvements at SPNWR.

Sincerely,

A handwritten signature in cursive script that reads "Judy Pierce". The signature is written in black ink and is positioned above the printed name and title.

Judy Pierce  
Acting Director



**St. Croix Environmental Association**  
*A Chapter of the Virgin Islands Conservation Society*  
5032 Anchor Way, Suite 3, Christiansted VI 00820  
(340) 773-1989 Fax (340) 773-7545 e-mail sea@viaccess.net  
[www.stxenvironmental.org](http://www.stxenvironmental.org)

Kevin S. Rose  
Environmental Team Leader  
Federal Highway Administration  
21400 Ridgeway Circle  
Sterling, VA 20166-6511

May 6, 2008

Ref. HFPP-15

Dear Mr. Rose,

Thank you for the opportunity to comment on the road and parking lot improvements proposed for Sandy Point National Wildlife refuge. The St. Croix Environmental Association (SEA) is pleased that the Federal Highway Administration (FHWA) in cooperation with the US Fish and Wildlife Service (USFWS) is preparing an Environmental Assessment (EA) on the proposed project. SEA will be looking for the EA to address potential impacts including but not limited to:

- impacts on sea turtles, birds and other wildlife, including impacts from vehicle lights and noise;
- surface water hydrology, especially where raised road beds exceed one foot;
- seasonal changes in saltpond water levels which may impact Least Tern, Wilson's Plover and other wildlife nesting habitat
- runoff during construction into saltpond, wetland, mudflat, open beach, and coastal marine environments;
- setbacks of road construction from and elevation above designated wetlands; and
- impacts on native xeric scrub habitat.

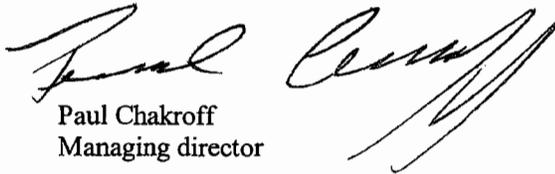
After preliminary review of Project RRP-SOP 10(1) 30% submission drawings, SEA staff feels that the EA must address the following specific issues:

- Sheet B1 illustrates an "Embankment Section" with a 4 ft. elevation "for use in Flooding Area near Western Saltpond." Introducing an embankment to control flood waters or control water levels may significantly impact nesting habitat for Least Terns and other wildlife. The EA must specifically address the intended use of the embankments and the impacts on wildlife, including territorially and federally listed species, Virgin Islands native species and habitat.
- Sheets D5, D6, D7, D16 and D17 illustrate sections of road where changes from existing grade to proposed road bed exceed 5 feet. The EA should address impacts on surface water hydrology and migratory patterns of land crabs in areas where the new road bed may serve as a barrier to wildlife movements or alter surface water flow (recognizing that on these sandy soils such flow may be minimal or non-existent except during severe rain events).

- Sheets D3, D4 and D5 illustrate relocation of a 900 ft. section of Tranberg Road closer to the eastern saltpond known locally as *Stilt Pond*. This saltpond is important nesting habitat for Least Tern, Black Necked Stilt, Wilson's Plover and migratory shore birds. The EA must address impacts from new road construction and the closer proximity of the road to Stilt Pond. The EA must address federally and territorially listed and Virgin Islands native plants that may be lost and birds and other animals whose habitat may be lost to new road construction, and propose compensatory mitigation for unavoidable losses of vegetation and habitat. An "alternative" that should be fully explored in the EA is the purchase of the strip of land or an easement across the private property, thus avoiding the need to relocate 900 ft. of road toward Stilt Pond. On preliminary evaluation, this may be SEA's recommended preferred alternative. If a land purchase option were to be considered, local organizations like SEA and/or a local land trust may be helpful in partnering with USFWS to help support conservation land or easement purchase.
- Sheet 21 illustrates that a new road section is proposed parallel to the shoreline connecting to the southern end of the proposed parking area. This stretch contains St. Croix Orchid, and possibly Cocoa Plum and other Virgin Islands native plants. It is an undisturbed example of xeric scrub forest which is becoming increasingly rare on St. Croix. The EA must address federally and territorially listed and Virgin Islands native plants that may be lost and birds and other animals whose habitat that may be lost to new road construction, and propose compensatory mitigation for unavoidable losses of vegetation and habitat. The EA must also address impacts of the parking area on turtle nesting, including any impacts of vehicle headlights if the parking area is to be raised.

We look forward to participating in public meetings and other opportunities for public comments as you move forward on the preparation of an Environmental Assessment on this project.

Yours,



Paul Chakroff  
Managing director

Cc. Michael Evans, Refuge Manager  
Sandy Point National Wildlife Refuge