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Caribbean Ecological Services Field Office
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In Reply Refer To:
FWS/R4/CESFO/72023-113

Submitted via electronic mail: notificaciones_ogpc@ddcc.pr.gov

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Secretario Auxiliar, OGPe
PO Box 41179
San Jan, PR 00940-1179

Re: 2024-579429-REA-300560, Cabo Rojo Land
Acquisition, LLC, Esencia Project, Boquerón, Cabo
Rojo

Dear Lic. Rivera:

This letter is in reply to the February 4, 2025, newspaper public notice, regarding the availability and comment period for the Draft Environmental Impact Statement (DEIS) for the Esencia Project. Our comments are issued as technical assistance in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the Endangered Species Act (16 U.S.C. 1531 et seq. as amended).

Cabo Rojo Land Acquisition (Applicant) is proposing the development of a 1,549 cuerdas (1,504 acres) site for a multiuse tourist/residential project consisting of 81 land parcels to be known as Esencia. The Applicant is requesting a full buildout evaluation, even though full development of the area may not be feasible at this time. The current proposal is for 530 hotel rooms, 1,132 residential units, a school, plus amenities such as shopping, 2 golf courses, trails, etc., including public access to the beach. The project also proposes an offsite private airfield designated by the Federal Aviation Administration as the “Boquerón Airport” id number PR-10 (DEIS, p. ii).

According to the information provided in the DEIS (Table 3, pp. 12-13), the U.S. Fish and Wildlife Service (Service) Information for Planning and Consultation (IPAC) system identified that 14 federally listed species may occur within the proposed project: Antillean manatee (*Trichechus manatus manatus*), Puerto Rican nightjar (*Antrostomus noctitherus*), Yellow-shouldered blackbird (*Agelaius xanthomus*), Roseate tern (*Sterna dougallii dougallii*), Puerto Rican boa (*Chilabothrus inornatus*), Hawksbill sea turtle (*Eretmochelys imbricata*), Green sea turtle (*Chelonia mydas*), Leatherback sea turtle (*Dermochelys coriacea*), Olive ridley sea turtle (*Lepidochelys olivacea*), Loggerhead sea turtle (*Caretta caretta*), *Aristida chaseae* grass (no

common name), *Catesbaea melanocarpa* shrub (no common name), *Eugenia woodburyana* tree (no common name), and Cóbana negra tree (*Stahlia monosperma*).

Of these 13 species, five were confirmed within the proposed project (DEIS, Tables 5 and 6): Puerto Rican nightjar, Yellow-shouldered blackbird, *A. chaseae*, *E. woodburyana*, and Cóbana negra. In addition, 27 neotropical migratory bird species were documented (DEIS, Table 8, pp. 38-39). The project area also overlies with the designated critical habitat for the yellow-shouldered blackbird. Although not found during the Flora and Fauna study (Ambienta, Inc. 2025), the project area is also within the range of the plant *Catesbaea melanocarpa* (no common name). In addition to listed species on the site, the area provides habitat for other local and seasonal wildlife, furthermore, the wooded drainages with scrub shrub vegetation typical of sub-tropical dry forest that serve as corridors for wildlife between the coastal mangroves and the upland forested hilltops, most of which will be dedicated to residential development, these areas should be incorporated into the project design and left as wildlife areas, nature trails or conservation zones.

After reviewing the information on the DEIS, we have the following comments and recommendations:

- 1) The USFWS considers this proposed project as a large-scale development. Despite the large amount of development, the project is presented as a “low density” development since the residential, hotel and infrastructure areas are estimated to occupy about 25% of the land, while the remaining 75% will be occupied by green areas such as two golf courses, landscaped areas, and zones designated for conservation (DEIS, p. 1). The DEIS (p. 1) specifies that the proposed areas for landscaping, natural corridors and golf course will be part of the impacts of the project. Thus, it seems that the proposed actions will impact most of the 1,549 cuerdas (1,504 acres) within the project area. According to the DEIS (p. 51), green areas comprise 547 cuerdas (531 acres), of which approximately 519 cuerdas (504 acres) would be occupied by the golf courses and project landscaping, which does not provide suitable habitat for the federally listed species occurring within the project area. Thus, we do not consider this project as a low-density development, but rather one that will essentially change the current landscape, hence, impacting the ecosystem functions and services.

Based on the above, we recommend that the Applicant include all areas of the project where the habitat will be modified in their project impact calculations.

- 2) Puerto Rican nightjar (PR nightjar):

According to the information in the DEIS (p. 33), nine PR nightjar individuals were observed in the property, including two active nests, and the species was identified in 39 of the of the nocturnal point counts and detected in 73 of the acoustic recording locations within a wide variety of habitats (i.e., forested zones, scrublands, grasslands, and coastal zones). In fact, the DEIS (p. 48) confirms that the PR nightjar has a wide distribution within the project area as illustrated in Figure 19 (DEIS Appendix 1). Although the information provided mentions that the nightjar was identified in 39 of the point counts

and detected in 73 of the acoustic recording locations, Figure 19 (DEIS Appendix 1) shows the species was identified in 45 point counts and 95 acoustic recording locations as shown by the number of green squares and reddish asterisk symbol in the figure, respectively.

Based on the information provided, the PR nightjar occupies most of the habitat within the proposed project area. Since the draft DEIS (p. 49) only generally describes impacts to this species, it should specifically assess and quantify how much of the nightjar habitat will be affected by the proposed project, including, but not limited to, the golf course impacts. In addition, based on the information provided on nightjar population density estimates in other areas outside of the project (DEIS, p. 49), the DEIS should estimate how many nightjar individuals may occur within the proposed project area. This would better describe the proposed project's impacts to the nightjar and its habitat.

It is important to note that the presence of the PR nightjar in the project area reflects the habitat quality for the species. In fact, the DEIS (p. 106) recognizes that several areas of the proposed project have regenerated as secondary forest with native vegetation after being more than four decades undisturbed. This has led to the formation of mature forested areas essential for the species (i.e., feeding, nesting, roosting).

As part of the actions to minimize impacts to PR nightjar habitat, the DEIS (p. 49) includes the reduction of impacts to forested areas with the "structure and composition" that favors the nightjar and minimize the fragmentation of this habitat. However, the DEIS (pp. 50-51) does not specify what are those measures other than a total of 386.7 cuerdas (375 acres) of natural areas and ecosystems will be conserved (mostly the coastal mangroves), a total of 251.9 cuerdas (244 acres) of natural corridors will be created, and a total of 547 cuerdas (531 acres) of green permeable areas will also be created (mostly golf course and landscaping). In addition, the DEIS (p. 51) proposes to buy land already occupied by the nightjar and transfer that land to the Puerto Rico Department of Natural and Environmental Resources (PRDNER). These measures are general and do not specifically explain how they will avoid or reduce the impact to the PR nightjar, a species sensitive to disturbance and habitat fragmentation as it relies on specific forested habitats for breeding and foraging. Habitat fragmentation disrupts demographic process by physically separating and confining nightjar populations into smaller units which is detrimental to the species. Moreover, it leads to increased edge effects that extends into the forest, reducing the quality of the habitat (e.g., suitable nesting sites), and disrupting the species' behavioral patterns, including foraging and mating. This poses significant threats to the nightjar population stability and overall survival, particularly for small, isolated populations located in forest fragments such as the proposed project area.

3) Yellow-shouldered blackbird (YSBL):

According to the information in the DEIS (p. 33), six YSBL were observed during the visual surveys and one YSBL was observed during point count surveys. Additionally, the species was detected in 36 of the acoustic recording locations within a wide variety of habitats (i.e., forested zones, scrublands, grasslands, and coastal zones). The DEIS (p. 47)

recognizes the YSBL has a widespread distribution within the project area as illustrated in Figure 20 (DEIS Appendix 1). We would like to point out that although the information provided mentions the yellow-shouldered blackbird was identified in 36 of the acoustic recording locations, Figure 20 (DEIS Appendix 1) shows the species was identified in 46 of the acoustic recording locations as shown by the number of yellow diamonds in the figure.

Although the DEIS (p. 47) specifies the YSBL has a wide distribution within the project area, it suggests its abundance in the area is low given the small number of individuals documented during surveys. Thus, the DEIS (p. 48) concludes that the species will not be significantly impacted should adjacent mangrove areas are not impacted. The DEIS further indicates a recovery project for the YSBL would be implemented following the measures that the PRDNER and the Service have been implementing with the species during the past several years. In addition, it recommends establishment of natural corridors to improve ecosystem connectivity and to create foraging areas for the species. Information available to our office indicates the YSBL uses the habitat in the project area extensively including the coastal scrub mangrove as well as the forested habitat in the upland areas. In fact, those forested areas are essential for the species, particularly during the nesting season where adults travel several times daily in search for food to feed their chicks.

Dense cover of coastal forests helps protect the YSBL from predators, increasing their chances of survival and successfully raising their offspring. Moreover, coastal forests can connect various habitats, allowing for greater mobility of the species, especially in areas facing habitat degradation like the southwest area of Puerto Rico where the YSBL occurs. As with the PR nightjar, the proposed conservation measures for the YSBL are general and do not specify how they will avoid or reduce the impacts of the project on the species. With regards to the project proposing to follow the measures implemented by PRDNER and the Service, it consists of installing artificial nesting structures for the YSBL. These structures require continued monitoring during the nesting period of the species and the DEIS does not specify who will implement that action or how it will be financed. Moreover, increasing the nesting activity of the YSBL within or on the vicinity of the project area would have no positive benefit to the species if the feeding habitat was destroyed. On the contrary, this might affect YSBL's survival as breeding pairs would need to travel longer distances in search for food for them and their chicks, resulting in a greater exposure to predators for both active nests and the adults, and would also result in an increased energy expenditure for the YSBL.

Regarding the YSBL critical habitat, the DEIS (p. 37) indicates that, based on the low density of YSBL individuals in the proposed project site, the areas designated as critical habitat for the species are areas of occurrence that harbors foraging habitat, but that are not necessarily critical for the species subsistence. It is important to clarify that critical habitats are designated under section 3(5)(A) of the Endangered Species Act, which defines critical habitat as (i) the specific areas within the geographical area occupied by the species, at the time it is listed, on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special

management considerations or protections; and (ii) specific areas outside the geographical area occupied by the species at the time it is listed, upon a determination by the Secretary that such areas are essential for the conservation of the species. Thus, the critical habitat for the YSBL was designated under the premise that it contains the physical and biological features essential for the conservation of the species.

4) Antillean manatee:

The Antillean manatee was identified as one of the species that may occur within the proposed project. The DEIS (p. 36) mentions that manatees were not detected during the site visits, since they occur outside of the areas that will be directly affected by the project. The DEIS (p. 36) also correctly identifies that manatees occur within the coastal waters of Cabo Rojo and Laguna Rincón.

According to information in our files, all coastal waters in Puerto Rico are occupied by the Antillean manatee and are known to specifically use the waters within Boquerón Bay, including Los Pozos and Laguna Rincón. In fact, the Service recently proposed 13 critical habitat units for the manatee in the coastal waters of Puerto Rico which include proposed Critical Habitat Unit PR-12 (1,989 acres) in Boquerón Bay, contiguous to the proposed project and including Laguna Rincón (89 FR 78134; September 2024). The Antillean manatee was also recently proposed for listing as an endangered subspecies throughout its entire range (90 FR 331; January 14, 2025).

The DEIS (p. 43) mentions that the Service, PRDNER, and NOAA have not designated any critical habitat within the coastal waters adjacent to the proposed project location and that the absence of designated critical habitat indicates or suggest that the area does not meet the specific criteria to be considered critical habitat as defined by the agencies. This indication or suggestion is misleading since critical habitat designations are completed as part of a regulatory process, can be proposed and revised at any time, and if not designated, it does not mean that any particular area does not meet the specific critical habitat criteria. For example, even though the West Indian manatee (i.e., Florida and Antillean manatee) was originally listed in 1970 along its entire range, it was not until September 2024, when critical habitat was first proposed for the Antillean manatee in Puerto Rico.

According to the DEIS (entire), the proposed project does not include any in-water construction or actions. In the absence of any in-water actions, the proposed project should not have any direct effects on the Antillean manatee. However, the Service would still evaluate any potential indirect effects of the proposed project on the manatee and its habitat. Thus, the applicant should evaluate any potential indirect effects that the proposed project may have on the Antillean manatee and its habitat. In addition, during a U.S. Army Corps of Engineer (Corps) interagency meeting on February 25, 2025, in which the proposed project Esencia was presented by the Applicant, the Corps specifically asked if this proposed project would include any in-water component, and the answer was no. In the future, if this project will propose any in-water actions, the

potential impacts to trust resources will be assessed in addition to and not separate to those already being evaluated as part of this DEIS.

5) Sea turtles:

According to the DEIS (Table 3, p. 13), the IPAC system identified five federally listed sea turtles that may occur within the proposed project: Green, Hawksbill, Leatherback, Olive ridley, and Loggerhead sea turtles. The DEIS (p. 36) mentions that no sea turtles were found during the site visits, that no suitable nesting areas were identified within the project area, and that no sea turtle tracts were found from May to July 2023. In addition, the DEIS (p. 36) specifies that according to the PRDNER data base, there are no records of sea turtle nests within the project area.

After reviewing the information in our files and consulting with PRDNER, we found that hawksbill sea turtles use the beach of the proposed project area for nesting. However, that nesting beach is not monitored as often as the index beaches (DNER 2013) in Puerto Rico, thus, sea turtle surveys in that area are considered limited. Furthermore, the peak nesting season for the hawksbill sea turtle in Puerto Rico is from July to November (Crespo and Diez 2022), which is outside of the May-July surveys conducted for this project.

The DEIS does not specifically evaluate nor discuss the potential impacts of the project on nesting sea turtles and their habitat. Since there is confirmed hawksbill nesting within the project area, the DEIS should specifically evaluate all potential project's effects on any sea turtle nests that may occur within the project area at any time and on the sea turtle nesting habitat including potential impacts to coastal vegetation. Those potential impacts should be evaluated both for the construction and for the operation and management of the project, including a sea turtle friendly lighting plan that complies with the law and regulation pertaining to the control and prevention of light contamination (Law 218-2008 and Regulation 8786) as specified in the DEIS (p. 93).

The DEIS does specify that the proposed project will require a delimitation of the maritime terrestrial zone (ZMT in Spanish) and that the project will follow the additional distances from the ZMT as required by PRDNER (DEIS, pp. 92-93). The DEIS also specifies that within these additional distances from the ZMT, they will create areas for planting, walking trails for beach access and in some cases, will create open areas for movable items such as chairs and tables (DEIS, p. 93). The information provided also mentions other components of the project within the coastal zones that can potentially impact sea turtles, such as an elevated boardwalk, bathrooms and showers, bicycle storage and roofed areas for resting (DEIS, p. 99).

Coastal development without comprehensive sea turtle conservation measures may result in habitat degradation and destruction, resulting in adverse impacts to sea turtles and their nesting habitat. Some of the activities that may affect these species and their habitat are destruction of native coastal vegetation, installation of permanent barriers or structures at their habitat, installation of artificial lights that can be seen from the beach,

vehicular traffic or parking within the beach areas, increased predation or damage by pest species, and root intrusion into nesting habitat from landscapes or exotic vegetation. Artificial lighting may keep females from coming onto the beach to nest and may cause disorientation of both adult female nesting turtles and emerging hatchlings, often resulting in their death. All projects should avoid affecting sea turtle nests and their nesting habitat.

- 6) Puerto Rican boa (PR boa): This species was not found within the project area despite multiple searches, but its presence is not discounted (DEIS, p. 35). After reviewing the information available in our files, we do not have records of the PR boa within the project area (Gould et al. 2008, USFWS 2021). The PR boa is considered a cryptic and mostly nocturnal species with low detectability (USFWS 2021). Thus, the DEIS should include the specific details on the methods used to conduct the searches for the PR boa, particularly since these may be the first documented PR boa searches within that area. For example, the date, time, effort invested and areas that were covered should specifically be documented.

The DEIS (p. 35) also mentions that several Reticulated pythons were found within the project area. To our knowledge, this invasive species has not yet been found in Cabo Rojo. Those records are most likely of the *Boa constrictor*, another invasive snake species that is well established in Cabo Rojo and other municipalities in the west.

- 7) Plants: The DEIS acknowledges the presence of federally listed plants Cóbana negra, *Eugenia woodburyana* and *Aristida chaseae*. As depicted, the project layout suggests the populations and suitable habitat of these species could be impacted by the proposed actions. Moreover, the DEIS (p. 35) acknowledges there is suitable habitat for the occurrence of the endangered plants *Trichilia triacantha* (Bariaco) and *Catesbaea melanocarpa* (no common name). However, according to the DEIS (p. 35), the flora and fauna study did not detect individuals of these two species. Although the latest *C. melanocarpa* 5-year status review considered this species as extirpated from Peñones de Melones, the occurrence of both *C. melanocarpa* and Bariaco within the project area should not be discarded. The reproductive ecology of both species may allow them to persist in the soil seedbank or as small seedlings that may develop into a viable population when conditions are favorable (e.g., moisture and light availability). Also, since their seeds are dispersed by birds, there could be undetected individuals of both species within suitable unexplored areas of the project. In fact, the DEIS (p. 35) acknowledge the *C. melanocarpa* still may occur within the proposed project area and that further surveys may be needed during the construction phase of the project. These populations harbor genetic diversity, which given their low number of known natural populations and long distance among populations, are important for their long-term viability and recovery.
- 8) The DEIS (p. 35) and the flora and fauna study (p. 6 and p. 59) provide few details on the conservation measures for the protection of the federally listed plants currently known within the project area, and in case further individuals or additional listed plant species are found during the construction phase. Site specific and species-specific conservation

measures showing how the project would reduce anticipated effects or how measures will be implemented to minimize impacts to these species need to be incorporated into the DEIS. We encourage the Applicant to avoid impacts to the plant species identified in the flora and fauna study and to develop sound conservation measures to ensure their long-term viability (e.g., designating on site conservation areas, forested corridors, developing species specific propagation plans that address the recovery of these species, and enhancing (augmenting) the existing natural populations). As mentioned in the flora and fauna (p. 5), because of the steep topography or occurring in the proximity of wetland areas, these plant species occur in areas that remained forested and are dominated by native vegetation. Therefore, an ideal scenario will be to identify these native forest areas and forested corridors and set them aside for long-term conservation.

- 9) Overall, the DEIS makes a general description of the direct effects of the project resulting from habitat removal or direct impacts to species but does not evaluate the direct and indirect effects of habitat fragmentation and edge effects, disturbance during construction and operation, future maintenance of facilities, impacts from residents within and beyond their property perimeters, among other effects, on the species.

As mentioned in our letter to the Junta de Planificación de Puerto Rico dated September 11, 2024, the dry forest landscape in the proposed project area serves as a natural wildlife corridor that connect with other nearby conservation areas (i.e., Cabo Rojo National Wildlife Refuge, Laguna Cartagena National Wildlife Refuge, the PRDNER Boquerón Wildlife Refuge, and areas managed by the NGO Para La Naturaleza). The Service is concerned that the project, as proposed, does not clearly show how it will avoid and minimize impacts to federally listed species and their habitat on a landscape perspective. Thus, we recommend that the Applicant adequately evaluate impacts to listed species and their habitats and provide detailed project plans overlaying the topography of the project area and the natural resources (e.g., wetland areas, native forest areas, locations of the recorded endangered animals and plants). In addition, the project plan should clearly identify cut and fill areas, and how these will result on impacts to the habitats. Furthermore, factors such as the increase in abundance of pets and feral animals (e.g., dogs and cats) that may predate on species like the PR nightjar are not addressed in the DEIS.

- 10) Consultation under the Section 7 of the Endangered Species Act (ESA): Threatened and endangered species and their habitat are protected by both Federal and Commonwealth laws and regulations. At the Federal level, the species are protected by the ESA of 1973, as amended. Section 7 of the ESA requires that Federal agencies ensure the actions permitted, funded, or carried out by that agency (Action Agency) will not adversely modify and/or jeopardize the continued existence of any federally threatened or endangered species. If the development of the Esencia project is expected to have Federal nexus through any of the actions indicated above (e.g., Federal permit), it will require a consultation under Section 7 of the ESA between the Federal Action Agency and the Service.

Habitat destruction or modification for the construction of the project could result in

adverse effects to federally listed species in the form of direct and indirect effects, which could result in “take” of those species. Take of an endangered species is prohibited by Section 9 of the ESA and is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such action. Harm in the definition of “take” refers to an act, which kills or injures federally listed wildlife. Such act may include significant habitat modification or degradation were it kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering.

If there isn’t a federal nexus, the project proponent is still liable for take of threatened and endangered species under the ESA. We recommend that the project proponent consider a Habitat Conservation Plan. A Habitat Conservation Plan (HCP) is a planning document designed to accommodate economic development to the extent possible by authorizing the limited and unintentional take of listed species when it occurs incidental to otherwise lawful activities.

- 11) As stated in several sections above, the project doesn’t propose actions to minimize or avoid impacts to habitats other than wetlands as presented during a recent interagency meeting with the Corps. The project does not propose any mitigation for upland impacts or to listed species that utilize that habitat. Rather it offers a possible land acquisition and deed transfer to the P.R. Department of Natural and Environmental Resources (to be determined later) to compensate for the loss of upland wildlife habitat. The take of listed species is not addressed.
- 12) During the Corps interagency meeting the Applicant stated they are considering applying for Audubon Cooperative Sanctuary Program for Golf Courses. However, this program requires an environmental planning and wildlife management component, which is not reflected in the DEIS
- 13) The Applicant should consider the need for both golf courses and re-design with land use for passive recreation such as hiking trails and wildlife viewing for guests and residents as well as to maintain an ecological/wildlife corridor that maintains connectivity of wildlife and plants in the area. The golf courses are a major part of the project impacts.
- 14) We are concerned with the lack of both water and power infrastructure to support the project and the disposal of solid waste and sewage. The DEIS (p. 5) states that there is a lack of proper infrastructure and mentions the need for major improvements in the area. For example, to supply the energy demand for the first phase of the project, they propose the construction of a solar field in 26.2 cuerdas (25 acres) (DEIS, p. 120). These areas will likely be devoid of vegetation that can shade the solar panels. Figure 42 (Appendix 1, p. 114) shows the proposed locations of the solar panels, but does not specify how it will impact the federally listed species that occur in the property.

For potable water it is estimated the project will require 1.5 million gallons per day at peak operation. Possible alternatives for potable water are multiple private wells with a water treatment plant for the brackish ground water. Hypersaline reverse osmosis

wastewater will then be discharged into lined evaporation ponds. These hypersaline ponds could become an attractive nuisance to migratory birds and other wildlife.

For sewage it is estimated that over 800,000 gallons of wastewater will be treated every day. An onsite tertiary wastewater treatment plant will be built, and treated wastewater will be used for project irrigation of green areas and golf courses. Treated runoff could increase nutrient loads in coastal areas and coastal wetlands.

- 15) Appendix 1 also has a series of Figures that do not seem to relate to the proposed project and or relevant for the DEIS. For example, Figure 6 (*Áreas Ecológicamente Sensitivas – Coquí Llanero*), Figure 6e (*Áreas Ecológicamente Sensitivas – Hábitat Monensis*), Figure 6f (*Áreas Ecológicamente Sensitivas – Sistema de Cuevas Rio Camuy*), and others. Applicant should revise and eliminate Figures that are not relevant to the project.

In conclusion, based on the information provided in the DEIS we believe that given the amount of habitat alteration and fragmentation that the Esencia project will entail to accommodate all the proposed project components, it should not be considered a low-density development. Rather it constitutes a major construction activity with potential significant adverse effects to federally listed species and the human environment.

We have expressed a willingness to work with the developer to ensure that the project has a reduction on the environmental impacts. We appreciate the conservation of much of the mangrove and salt flat area, as the developer continues with the permitting process without changes to the project footprint, without any modifications beneficial to wildlife, we are concerned for the take of endangered species in the project footprint.

Thank you for the opportunity to comment on this action, if you have any questions, please do not hesitate to contact me at your earliest convenience.

Sincerely,

LOURDES
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Lourdes Mena
Field Supervisor

fhl/jac/

cc:

DNER, San Juan
PRPB, San Juan
COE, San Juan

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