



May 25, 2006

Junta de Planificación de Puerto Rico

Oficina de la Secretaria
Centro Gubernamental
Roberto Sánchez Vilella
Apartado 41119
San Juan PR 00940-1119

RE: Certificación de Compatibilidad Federal No. CZ-2004-1113-044, Solitud Conjunta #518

Dear Sir or Madam:

The Surfrider Foundation, our 64 chapters and 50,000 members, including the Rincón Chapter of the Surfrider Foundation respectfully offer the following comments regarding the proposed aquaculture project in a 20 hectare area 3 nautical miles from the shores of Punta Higuera in Rincón.

The Surfrider Foundation is a non-profit environmental organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through conservation, activism, research and education. The Surfrider Foundation has been active in Puerto Rico (PR) for over a decade and was most recently involved in the establishment of the Reserva Marina Tres Palmas – a marine reserve that protects some of the healthiest elkhorn coral (*Acropora palmata*) found in the Caribbean¹. Additional information can be found at: <http://surfrider.org/rincon/>

We believe the proposed project may pose a threat to the persistence of *Acropora* in Rincón. The impacts of this operation are unverified upon coral or *Acropora* species, but it could be devastating for local *Acropora* populations if these operations cause any of the following:

- increased nutrients in local waters leading to eutrophication

¹ Bruckner, Andrew PhD. Letter to Puerto Rico Department of Natural Resources. December 6, 2001.

- damage to *Acropora* coral colonies by cage detachment and collision
- introduction of disease developed in the cages to local fauna
- reduction in larvae supply reaching the coast due to larval collection at the aquaculture site

Such a project should be sited far enough away so that there are no indirect or direct impacts upon the resources within the Reserva Marina Tres Palmas. **Therefore we recommend that permitting of offshore aquaculture operations be postponed until the full impacts of this type of operation upon the Reserva Marina Tres Palmas, *Acropora* and other marine species can be assessed completely.**

Thank you for the opportunity to comment on this permit.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chad E. Nelsen', written in a cursive style.

Chad E. Nelsen
Environmental Director
Surfrider Foundation