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United States Department of the Interior

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Fort San Geronimo Special Resource Study Public Scoping Report

SUMMARY

This document provides a summary of the public comments received during public scoping concerning the Fort San Geronimo Special Resource Study. Fort San Geronimo and associated sites are in San Juan, Puerto Rico. These historic sites were part of the Advance Defensive Line and the City Walls constructed for the Spanish Colonial capital of San Juan. The fort is currently managed by the Commonwealth of Puerto Rico and the associated sites are under both private and public ownership. In 2009, the National Park Service (NPS) was directed to complete a special resource study (SRS) to determine whether these sites meet the criteria for inclusion in the national park system as part of the NPS San Juan National Historic Site and to evaluate other potential management options.

Public scoping meetings were held on February 1 and 3, 2011, in San Juan. A newsletter describing the purpose and phases of the special resource study were distributed in both Spanish and English prior to these meetings. The public was invited to these meetings using press releases and local television announcements featuring interviews with NPS staff concerning the study and the purpose of the scoping meetings.

Before each public meeting, participants were invited to attend a guided tour of Fort San Geronimo, led by a staff historian/archeologist of the Institute of Puerto Rican Culture. The tour also included a guided tour of the NPS San Juan National Historic Site's preservation facility, led by NPS staff and using park trams for transportation between the preservation facility and the fort.

At the public meetings, NPS staff presented the purpose and goals of the special resource study, project background, and an outline of the phases of the study. The National Park Service presented this information in both Spanish and English. Project managers from the Institute of Puerto Rican Culture and the U.S. Army Corps of Engineers participated in both meetings for the purpose of

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updating the public on their respective projects that involve the stabilization and rehabilitation of Fort San Geronimo.

In addition to the two public meetings, the NPS study team held a stakeholder meeting on February 2 with representatives from the U.S. Army Corps of Engineers, the Puerto Rico State Historic Preservation Office (SHPO), Puerto Rico Tourism Co., Municipality of San Juan / Department of Urbanismo, Resident Commissioner Pierluisi's office, Governor Fortunos Office, Institute of Puerto Rican Culture, and staff from the NPS San Juan National Historic Site. At this meeting, representatives from the Resident Commissioner Pierluisi's office, Governor Fortunos Office and the Municipality of San Juan expressed their support for Fort San Geronimo being repaired and developed as a tourist venue. The U.S. Army Corps of Engineers, Institute of Puerto Rican Culture, and Puerto Rico SHPO representatives provided overviews of their current Fort San Geronimo projects and involvement. Issues and threats facing Fort San Geronimo as well as opportunities and management options were discussed during this meeting.

The comments contained in this document were received from the public in four ways: (1) direct input into the Planning, Environment, and Public Comment (PEPC) system, either independently or by using Spanish- and English-language computer stations available at the public meetings, (2) e-mail correspondence, (3) hard-copy letter, or (4) completed and mailed comment forms. The public was asked to respond to the following three questions:

1. What are your thoughts about management options for Fort San Geronimo?
2. What are your thoughts about management options for the other related sites included in the special resource study?
3. Please share any questions or concerns or information regarding any of the potential sites.

A general comment section was also provided. Comments below are organized by these three track questions followed by general comments received and other e-mail or letter comments.

A total of 17 correspondences were received, including 8 PEPC entries, 8 comment cards, and 1 letter. Overall, the comments received were very supportive of restoration and long-term care of Fort San Geronimo, which received disproportionately more attention in the public comments than the other associated study sites. Respondents stressed the cultural importance of Fort San Geronimo, expressed concern for its current state of disrepair, and were supportive of National Park Service involvement in this effort. While many believe that local governments should be responsible for Fort San Geronimo, respondents were concerned about their ability to maintain this site and therefore would welcome the expertise of the National Park Service. Multiple comments included concern for how public access will be gained to the site due to other adjacent developments. Multiple comments stressed the need for quick action concerning restoration of Fort San Geronimo. A few comments included concerns about environmental and legal requirements that will need to be addressed if the site is restored and developed.

COMMENTS

Please note: comments have been included as received; no edits have been made.

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TOPIC QUESTION 1: What are your thoughts about management options for Fort San Geronimo?

Correspondence 1-2: "I suggest that The San Geronimo Fort be owend by Puerto Rico but be managed and operated by the National Park Service under a lease arrangement. Unfortunately the governments of Puerto Rico and of the Cty of San Juan have been careless (to say the least) with the preservation and management of this property. To be sure many in PR will complain about the NPS and about the proposed NPS plan with some justification but when all is said and done and weighed on a scale the benefits of NPS custody far out weigh the past mismanagement of the fort under Puerto Rico. If not for the NPS the forts of El Moro and San Cristobal would be in the same state of deterioration as SG and if not then condos for the elite."

Correspondence 1-5: "Explicite lines of management that it is managed and maintained by the National Park Services. No and, ifs or butts!"

Correspondence 1-8: "Believe that the work currently being done by the U.S. Army Corps of Engineers (COE), Planning Division to protect the shoreline of the fort needs to be taken into account in the special resource study and evaluation of options for management of the fort should it become part of the San Juan National Historic Site. In addition, the National Park Service needs to be aware that the area around the fort provides habitat for Endangered Species Act (ESA) listed species, including hawksbill and green sea turtles, and that listed corals and their designated critical habitat are present in nearshore waters outside Condado Lagoon. For this reason, work the COE will be doing to stabilize the shoreline of Fort San Geronimo was closely coordinated with the National Marine Fisheries Service (NMFS) to minimize potential impacts to seagrass and colonized hardbottom. Any management options you consider need to include a consideration of the potential impacts to listed species and designated critical habitat. Any management actions that you undertake may require a section 7 consultation pursuant to the requirements of the ESA if the action could result in impacts to listed species and their habitat. Note that the consultation requirement includes perceived beneficial effects."

Correspondence 1-9: "National Park Service does Great Job with [illegible], They should Take This over also!"

Correspondence 1-10: "NPS San Juan Historic Site has done an outstanding job in mantaining San Felipe and San Cristobal Fortreses. I highly recommend to manage san Geronimo also."

Correspondence 1-11: "Since this is U.S. territory and all the historical sites have been take care of the U.S. N.P.S. in perfect condition; the Fort San Geronimo should be under the same management."

Correspondence 1-12: "Our local government does not have the resources to protect and manage this site. This is why I think that it would be positive if the Park Service manages it."

Correspondence 1-13: "I think the best option would be the mangement of the U.S. National Park Service, because they have proven with all the other projects that they have the know how and perfection with/their managment."

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Correspondence 1-15: "I am overwhelmingly convinced that Fort San Geronimo represents one of the most hauntingly beautiful architectural jewels in all of Puerto Rico. That it has been allowed to disintegrate into a near inaccessible ruin is nothing short of scandalous. Responsibility for this rests squarely with the current administration, as it must be assigned equally to previous state governments. Nor can the mayor's office be considered as beyond the severest criticism. Having resided eighteen years in Latin America and having been raised both in the United States and Europe I may state, unequivocally, that never have I witnessed a more egregious disregard for a people's national patrimony than in the example of Fort San Geronimo."

TOPIC QUESTION 2: What are your thoughts about the management options for the other related sites included in the special resource study?

Correspondence 2-5: "Verbatim! That they are managed, maintained and oversight watch over the care, restoration and maintenance of each site."

Correspondence 2-6: "Because the other related sites were not specified and the special resource study is apparently underway rather than available for review, this is difficult to answer. However, as for question 1 above, potential impacts to ESA resources need to be evaluated. NMFS recommends that resource studies include maps of the sites being considered for inclusion in the San Juan National Historic Site, as well as the location of these sites in relation to ESA resources. Any in-water or shoreline work required as part of the resource studies or future management actions, including shoreline stabilization or other construction, may require a section 7 consultation pursuant to ESA requirements."

Correspondence 2-7: "All sites should be considered as one and managed by NPS"

Correspondence 8: "I think overall they need to be better "displayed" as it were. Right now, unless a someone has read about the First Line of Defense and Fort San Geronimo, no one would know the name of the ruins just west of it, on Avenida Constitución (Santa Elena Battery) and it's sister structures in Escambrón beach and further east. I think there is more that can be done to properly put in context the role of the larger structures of El Morro and San Cristobal as part of an islet wide system of defense. Tours could extend beyond the current traditional routes, which in turn allow local businesses to grow. The National Park Service should take a more active role in preserving these landmarks."

Correspondence 2-9: "National Park Service should manage all!"

Correspondence 2-10: "NPS San Juan Historic Site staff is highly capable of managing any options that they will be responsible for."

Correspondence 2-11: "All should be taken care of the U.S. N.P.S.- as the best option."

Correspondence 2-12: "I believe that the national Park Service could effectively manage all other sites."

Correspondence 2-13: "The name opinion, they should all be managed by the U.S. N.P.Service."

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Correspondence 2-14: "Attrackons of San Juan- It would be best if Geronimo was part of the system."

TOPIC QUESTION 3: Please share any questions or concerns or information regarding any of the potential sites.

Correspondence 3-5: "That they are well protected, maintained by the National Park Service. That the restoration be done by the National Park Service. You have the experience and know the process extremely well. Each one of the sites in question are under the Department of Arts & Culture and the reason that they have become deteriorated. They do not have the where with all and the man-power to do the maintenance or over-sight necessary to keep them restored or maintained."

Correspondence 3-6: "Believe access to some or all of the sites will be a significant issue that needs to be addressed. NMFS would be concerned with any proposed demolition or construction activities along the shoreline associated with the management of these areas should they be incorporated in the National Historic Site. NMFS is aware that colonies of listed corals are present in many areas along the north shore of Old San Juan, as well as ESA-designated critical habitat for ESA-listed corals."

Correspondence 3-7: "There's a square Garita located on the entrace grounds of the Caribe Hilton Hotel. This is the only square Garita still standing today. Its condition is Extreemly critical, its about to colapse any day. Special attention should be given to this site being its the only square garita left and we are in time to preserve it for future generations to enjoy."

Correspondence 3-8: "How detrimental is the current real estate develoment to the condition of the Fort San Geronimo site? Can the National Park Service intervene to stop further construction? A few years ago the Puerto Rico Supreme Court allowed construction of Paseo Caribe real estate complex on reclaimed land (previously underwater). It is my opinion that this decision came about erroneously as the land in question is clearly within the maritime zone and should be considered public property. Can the National Park Service protect public access to this site?"

Correspondence 3-10: "My concern will be the public access to Fort San Geronimo and parking facilities

Correspondence 3-11: "I am concerned that more time is passing by without getting to start the project. -More and more detoriaration will occure."

Correspondence 3-12: "I feel that the National Park Service is the only organization that can manage all potential sites."

Correspondence 3-13: "All the projects should be started as soon as possible."

Correspondence 3-14: "It would be great if there was a walking trail between al the forts/Nalt Park sites in OSJ [Old San Juan]."

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Correspondence 3-15: "I believe the best option for all historical sites in Puerto Rico ought to come under the jurisdiction of the National Park Service."

ADDITIONAL COMMENTS:

Correspondence 4: "Great job! Keep them going!"

Correspondence 9: "Better security/maintained. Sites are- Better for tourism and OSJ"

LETTER COMMENTS:

Correspondence 16: From the Corporation for the Conservation of the San Juan Bay Estuary:

"Reference is made to the public meetings held by the National Park Service related to Fort San Gerónimo in San Juan, Puerto Rico. Although the Corporation for the Conservation of the San Juan Bay Estuary was not able to attend the public meetings due to previous commitments, we would like to express our opinion for the consideration of the National Park Service.

The Corporation for the Conservation of the San Juan Bay Estuary is a non-profit corporation which manages the San Juan Bay Estuary, a program affiliated to the National Estuary Program of the U.S. Environmental Protection Agency. On August 4, 2000, the Governor of Puerto Rico, Dr. Pedro J. Rosselló, submitted to the Administrator of the U.S. Environmental Protection Agency, Ms. Carol M. Browner, the Comprehensive Conservation and Management Plan (CCMP) for the San Juan Bay Estuary. This comprehensive plan was developed as a result of a 1993 Management Conference, composed by the estuary's stakeholders that included federal, commonwealth and municipal officials, and leaders of environmental and communities groups. The CCMP articulated the goals for the conservation of the estuary suggested by the community representatives that comprised the San Juan Bay Estuary. The CCMP was approved by the Administrator, and a partnership was developed to implement the recommendations of the CCMP. Fort San Geronimo is located on the Condado Lagoon, which is one of the several lagoons which form the San Juan Bay Estuary. As a matter of fact, it is one of only three outlets that connect the estuary to the Atlantic Ocean. The Condado Lagoon is the most diversified aquatic lagoon of the estuary system. Coral communities and other invertebrates can be found in the lagoon together with a significant amount of SAV meadows and coral reefs fishes.

As stated in your public announcement: "The National Park Service was directed by U.S. Congressional legislation in 2009 to conduct a special resource study to determine whether Fort San Geronimo and related sites meet the eligibility criteria as a unit of the national park system and to be included and made a part of San Juan National Historic Site. San Juan National Historic Site is comprised of Castillo San Felipe del Morro, Castillo San Cristóbal, Fort San Juan de la Cruz, San Juan Gate and 2/3 of the city Historic Walls. Fort San Geronimo has been managed since 1948 by the Commonwealth Government of Puerto Rico, and other related defensive sites are under private or public ownership." However, the fort's poor management practices under commonwealth government control and private use due mostly to the lack of vision, priorities, assignments of funds and management goals have resulted in the deterioration of the fort to the extends that its walls might fail and collapse due to the erosion of its foundations because of wave action and lack of an

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adequate maintenance program.

The Corporation for the Conservation of the San Juan Bay understands that the San Geronimo Fort is a historic building which must be properly conserved for the benefit of the present and future generations. The existing physical conditions of the fort to the views of tourists and local recreational enthusiasts is a sore site to the eye, especially when it is adjacent to the Caribe Hilton Hotel and the high-density residential areas. Moreover, it is a security risk for people that venture into the structure and fish in its vicinity at the entrance to the Condado Lagoon. It is shameful for our governments to maintain the historic site in such poor conditions without any sign for improvements in the nearby future. These conditions probably moved Puerto Rico's Resident Commissioner, the honorable Luis Fortuño, in 2009 to recommend to the U.S. Congress the transfer Fort San Gerónimo and related sites to the San Juan National Historic Site.

The Corporation for the Conservation of the San Juan Bay Estuary respectfully recommends the transfer of Fort San Gerónimo to the San Juan National Historic Site. We are well aware that the National Park Service will properly maintain the fort and made readily available it access for visits by the general public. If this recommendation is adopted, the vast majority of the People of Puerto Rico would have an immense debt of gratitude for the proper management of this historic site for the benefit of our present and future generations.”