United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, DC 20240

The Honorable Lisa Murkowski
Chairman, Committee on Energy
and Natural Resources
United States Senate
Washington, DC 20510

MAR 06 2020

Dear Chairman Murkowski:

I hereby transmit the enclosed Fort San Gerónimo and Other Related Resources Special Resource Study/Boundary Study. The study was conducted pursuant to Public Law 111-11, which directed the Secretary of the Interior to determine the national significance, suitability, and feasibility of including Fort San Gerónimo and other related resources in the Commonwealth of Puerto Rico as part of San Juan National Historic Site (NHS); and the methods and means for the protection and interpretation of Fort San Gerónimo and other related resources by the National Park Service (NPS), other Federal, State, or local government entities, or private or non-profit organizations. The study was conducted by the NPS.

For 500 years, San Juan, Puerto Rico played a key role in the European powers' command of the Caribbean as a strategic access point to the Americas. The study evaluated Fort San Gerónimo and 14 other related resources associated with the massive fortification system built by Spanish military engineers between the 16th and 19th centuries to protect the City. Fort San Gerónimo, the core of the study area, is a small, two-level, stone masonry fort listed on the National Register of Historic Places in 1983 and is now partially submerged by water in the Condado Lagoon. The other study area sites are scattered throughout and adjacent to the islet of San Juan.

Section 100507 of Title 54, United States Code, establishes the criteria to be considered in the study of an area for potential inclusion in the national park system. A study area must possess nationally significant natural or cultural resources and represent one of the most important examples of a particular resource type in the country; be suitable and feasible for addition to the system; and appropriate for direct NPS management.

Fort San Gerónimo was individually evaluated and found to meet special resource study (SRS) criteria for national significance and suitability, but not feasibility. Among the numerous aspects of feasibility evaluated, the most prohibitive factor of feasibility is the high cost of historic preservation treatment to repair and rehabilitate the fort, which is severely deteriorated and in poor condition. As a result of the negative feasibility findings, the need for direct NPS management criterion was not evaluated in detail. The other related resources were evaluated both individually and collectively, but none was found to meet the SRS criterion for national significance, and thus were not evaluated further as a potential unit of the national park system.

The study also evaluated the fort and the 14 related resources according to NPS boundary study criteria to determine whether the resources meet criteria for inclusion within the boundary of San

Juan NHS. The study found that Fort San Gerónimo has potential to enhance opportunities for public enjoyment related to the purpose of San Juan NHS; the alternatives for management are inadequate for preserving and protecting the fort, but the estimated cost of $17,128,000 to address the deferred maintenance was determined to be infeasible for potential inclusion within the boundary of the existing park unit.

Of the 14 other related resources, only five resources (Santa Catalina Bastion, La Concepción Bastion, San Justo Bastion, Escambrón Battery, and Polvorín de San Gerónimo) met the boundary study criterion for significance. Upon further evaluation, these five resources were found to be adequately managed and protected by the Commonwealth of Puerto Rico and do not meet the criterion regarding the need for direct NPS management. Therefore, none of the sites in the study area meets the boundary adjustment criteria.

Given that Fort San Gerónimo and the other related resources do not meet the congressionally mandated criteria for new units of the national park system or boundary study criteria for addition to San Juan NHS, the NPS is not able to recommend that Congress consider inclusion of these sites as part of the national park system. The NPS recognizes that despite the negative study findings, there is strong public support and a potential opportunity for enhancing the interpretation and preservation of Fort San Gerónimo and many of the other associated sites. In cases where resources meet SRS criteria for national significance and suitability but do not meet other criteria for inclusion in the national park system, an alternative designation such as an affiliated area could be considered.

Thank you for your interest in the National Park Service. A similar letter is being sent to the Honorable Joe Manchin III, Ranking Member, Committee on Energy and Natural Resources, United States Senate; the Honorable Raúl Grijalva, Chairman, Committee on Natural Resources, U.S. House of Representatives; and the Honorable Rob Bishop, Ranking Member, Committee on Natural Resources, U.S. House of Representatives. The Honorable Jenniffer González-Colón, Resident Commissioner of Puerto Rico, will also receive a copy of the study and this letter.

Sincerely,

David Vela
Deputy Director, Operations
Exercising the Authority of the Director

Enclosure

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The Honorable Raúl Grijalva
Chairman, Committee on Natural Resources
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Grijalva:

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The study also evaluated the fort and the 14 related resources according to NPS boundary study criteria to determine whether the resources meet criteria for inclusion within the boundary of San Juan NHS. The study found that Fort San Gerónimo has potential to enhance opportunities for

public enjoyment related to the purpose of San Juan NHS; the alternatives for management are inadequate for preserving and protecting the fort, but the estimated cost of $17,128,000 to address the deferred maintenance was determined to be infeasible for potential inclusion within the boundary of the existing park unit.

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Ranking Member, Committee on Natural Resources
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