



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Caribbean Ecological Services

Field Office

P.O. Box 491

Boqueron, PR 00622

SEP 10 2015

In Reply Refer To:
FWS/R4/CESFO/EC-CRRT

CRRT Co-Chairs
US Coast Guard
US Environmental Protection Agency

Re: Caribbean Regional Response Team (CRRT) Pre-
Authorization for the use of Dispersants, Solidifiers, and
In-Situ Burn, During Oil Spills

Dear Sirs:

This is in reply to your August 2015 letter requesting a review of the current species determinations under Section 7 of the Endangered Species Act. Our comments are issued in accordance with the Endangered Species Act (16 U.S.C. 1531 et seq. as amended). The Service had previously reviewed and commented on the following documents:

1. Biological Assessment of the Effects on Listed Species for Limited Use of Dispersants in the Caribbean, March 3, 1997.
2. Biological Assessment for the Pre-Authorized Use of In Situ Burning (ISB) in the Caribbean, March 31, 1995.
3. Biological Evaluation on Limited Pre-Authorization and Use Policy for Chemical Countermeasures (Solidifiers) of Federally Endangered, Threatened and Candidate Species within Regional Response Team 4 and the Caribbean Regional Response Team, April 26, 2006.

The species of concern are the Antillean manatee (*Trichechus manatus manatus*) and the roseate tern (*Sterna dougallii dougallii*) and nesting leather back (*Dermochelys coriacea*), green (*Chelonia mydas*) and hawksbill (*Eretmochelys imbricata*) sea turtles. The Service had previously concurred with the CRRT that the above plans and policy were not likely to adversely affect listed species under our purview.

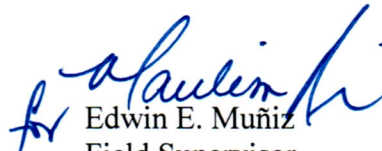
The Service's Caribbean Ecological Services Field Office is an active member of the CRRT and has participated in the ongoing review and development of Best Management Practices for spill

response in the Caribbean, including dispersants and ISB. These BMPs include minimization and avoidance measures such as boat speeds, use to ATVs, buffer zones etc. These will act as conservation measures to minimize spill response actions to listed species. Given the existing conservation measures in the current plans and policy and the development of the BMPs, we continue to concur with the CRRT that the Dispersant Use Plan, In Situ Burn Plan and use of Solidifiers is not likely to adversely affect the manatee or the roseate turn.

Therefore, no further consultation is required. Nevertheless, if the project is modified or if information on impacts to listed species becomes available this office should be contacted concerning the need for the initiation of consultation under section 7 of the Act.

Thank you for the opportunity to continue to provide assistance to the CRRT, if you have any questions please contact Felix Lopez of my staff at 787 851-7297 x210.

Sincerely,



Edwin E. Muñiz
Field Supervisor

fhl

cc:

REO, Atlanta

Greg Masson, FWS, Atlanta

DNER, San Juan