

TRIBUNAL DE APELACIONES DE PUERTO RICO

Comunidades Protectoras del Río Piedras, Inc. v. Departamento de Recursos Naturales y Ambientales

Comunidades Protectoras del Río Piedras · No. KLAN202500184 · Decided December 5, 2025

SUMMARY

The Puerto Rico Court of Appeals affirmed the dismissal of an action seeking to enjoin and declare unlawful a Río Piedras flood-control construction project. The court held that the U.S. Army Corps of Engineers was an indispensable party because the project arose from a contract between the Corps and Puerto Rico's Department of Natural and Environmental Resources, and it declined to reach the remaining jurisdictional and dismissal issues.

CASE DETAILS

COURT	Tribunal de Apelaciones de Puerto Rico
WRITING FOR THE COURT	Juez Robles Adorno; Juez Rodríguez Casillas; Juez Marrero Guerrero; Juez Campos Pérez
JURISDICTION	Puerto Rico Court of Appeals
DECIDED	December 5, 2025
DOCKET	KLAN202500184
DISPOSITION	affirmed
PROCEDURAL POSTURE	The appellants appealed the Puerto Rico Court of First Instance's dismissal of their complaint seeking injunctive and declaratory relief concerning a flood-control construction project. The trial court dismissed for failure to join the United States Army Corps of Engineers as an indispensable party.
STANDARD OF REVIEW	On a Rule 10.2 motion to dismiss, the court accepts the complaint's well-pleaded facts as true and construes them in the plaintiff's favor. Dismissal is proper when, even under a liberal reading of the complaint, the plaintiff would not be entitled to relief under any state of facts that could be proven. The court also independently considers indispensable-party and jurisdictional defects.
PRECEDENTIAL VALUE	published and precedential

PARTIES

Comunidades Protectoras del Río Piedras, Inc., en representación de los vecinos del Río Piedras, Frances Alemán Fernández, Dinary Camacho Sierra, Lydia Puente Colón, Elsa Rodríguez López, José Jiménez Monroig, Rosario Calderón Julia, Juan de Dios Angulo Ballesteros, Eddie Antúnez Reyes, Eva L. Arzola Delgado, Graciela Joselin Belaval Bruno, Ana Deseda Belaval, Grace M. Díaz Pastrana, Arnaldo Figueroa Figueroa, Daniel González Chacón, Sofía González Urrutia, Roberto Maldonado Nieves, Vladimir Morales Rivera, Erminia Pineda-Muntal, Ernesto Calro Llavona, Madelain Romero Fresneda, María E. Hernández Torrales, Marylin Mártir Gaya, Migdalia Ramos Rodríguez, Pedro Deliz Benítez, Ricardo Vélez González, Vanessa Giraldi Mena, Vanessa del C. Irizarry v. Departamento de Recursos Naturales y Ambientales, Municipio Autónomo de San Juan, Universidad de Puerto Rico, Sutano y Mengano

TOPICS

injunctions

motions to dismiss

joinder

subject matter jurisdiction

appellate procedure

PRACTICE AREAS

civil procedure

appellate procedure

environmental law

injunctive relief

QUESTIONS PRESENTED

1. Whether the United States Army Corps of Engineers was an indispensable party to an action seeking to invalidate and enjoin a construction project established by a contract between the Corps and the Puerto Rico Department of Natural and Environmental Resources.
2. Whether the trial court properly dismissed the action for failure to join the Army Corps without reaching the separate personal-jurisdiction and failure-to-state-a-claim issues.
3. Whether the trial court properly dismissed the claims against the Municipality of San Juan and the University of Puerto Rico.

HOLDINGS

1. The Army Corps of Engineers was an indispensable party because the complaint sought to declare invalid and halt a construction project created by a contract between the Corps and the Department of Natural and Environmental Resources, directly affecting the Corps' interests.
2. The absence of an indispensable party is a jurisdictional defect requiring dismissal of the action.
3. The court properly declined to address the personal-jurisdiction issue concerning the Department and the Rule 10.2(5) failure-to-state-a-claim issues after determining that the absence of an indispensable party deprived the trial court of jurisdiction.

KEY QUOTATIONS

“El planteamiento de parte indispensable se puede presentar en cualquier momento, incluso por primera vez en una apelación.” (11)

“La falta de parte indispensable incide sobre la jurisdicción del Tribunal, y hemos expresado que, reconocida la ausencia de una parte indispensable, debe desestimarse la acción.” (12)

“En el presente caso, el Cuerpo de Ingenieros es, como correctamente determinó el foro primario, una parte indispensable en el pleito.” (13)

FACTUAL BACKGROUND

The appellants challenged a proposed Rio Puerto Nuevo flood-control and channelization project involving land in the San Juan Ecological Corridor. The project was established through a Project Cooperation Agreement between Puerto Rico's Department of Natural and Environmental Resources and the United States Army Corps of Engineers. The appellants alleged that the project lacked an environmental impact statement and required permits, and sought to enjoin the project and have it declared illegal. Although they sought permission to add the Army Corps as an indispensable party, they never joined it.

PROCEDURAL HISTORY

The appellants filed suit in the Puerto Rico Court of First Instance against the Department of Natural and Environmental Resources, the Municipality of San Juan, and the University of Puerto Rico, later adding the Commonwealth as a defendant. The trial court determined that the Army Corps of Engineers was an indispensable party because the challenged project arose from a contract between the Corps and the Department, and dismissed the action. The Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Inmobiliaria Baleares, LLC v. Benabe González, 214 DPR 1109 (2024)
- Conde Cruz v. Resto Rodríguez et al., 205 DPR 1043 (2020)
- Cobra Acquisitions v. Mun. Yabucoa et al., 210 DPR 384 (2022)
- López García v. López García, 200 DPR 50 (2018)
- Pérez Ríos v. Luma Energy, LLC, 213 DPR 203 (2023)
- RPR & BJJ, Ex parte, 207 DPR 389 (2021)
- Cepeda Torres v. García Ortiz, 132 DPR 698 (1993)
- Deliz et als. v. Igartúa et als., 158 DPR 403 (2003)
- SLG Szendrey Ramos v. F. Castillo, 169 DPR 873 (2007)
- Morán v. Martí, 165 DPR 356 (2005)
- García Colón v. Sucn. González, 178 DPR 527 (2010)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/puerto-rico-court-of-appeals-tribunal-de-apelaciones-de-puerto-rico/2025/comunidades-protectoras-del-rio-piedras-inc-v-departamento-z02n2ycq>