

INTERNATIONAL COURT OF JUSTICE

CERTAIN ACTIVITIES CARRIED OUT BY NICARAGUA IN THE BORDER AREA
(COSTA RICA V. NICARAGUA)

Comments on the Reply of Nicaragua

Questions put by Judge Simma

1. Judge Simma's first question was the following:

Before the hearing of 11 January 2011, did Nicaragua ever make, or attempt to make, Costa Rica aware of its claim according to which the course of the boundary does not follow that documented on all existing—including Nicaraguan—maps, but “reaches the river proper by the first channel met”—that is the First Alexander Award of 1897—this clause being interpreted as referring to the “Caño Harbor Head”?

2. Nicaragua's reply fails to answer the question asked. Judge Simma's question relates to Nicaragua's novel interpretation that the “Caño Harbor Head” is the channel referred to in the First Alexander Award of 1897. He asks, specifically, if Nicaragua ever informed Costa Rica of this new interpretation prior to 11 January 2011. Nicaragua's response refers to largely unrelated matters.

3. Nicaragua's response refers first to its “White Book”. This was published on 26 November 2010, almost a month after Nicaraguan occupation of Costa Rican territory started. It obviously cannot be taken as a formal communication to Costa Rica. Furthermore, the White Book differs materially from the position Nicaragua took during the hearings. The map included in the White Book at p. 16 showing the alleged “Costa Rican claim” (indeed, the Nicaraguan

one) shows a line that does not correspond to the claim advanced by Nicaragua during the hearings, i.e. that the boundary follows the right bank of the “caño Harbor head” or “first caño”.¹

4. Nicaragua then mentions that at the 3 November 2010 session of the OAS Permanent Council, “this” was also “spelled out” by Nicaragua. By “this” it appears that Nicaragua refers to “the legal reasoning of Nicaragua’s claim to the area in dispute”. However, the minutes of the session of 3 November do not mention either the novel interpretation of Alexander’s First Award or “Caño Harbor Head”. Nicaragua’s Ambassador was so ambiguous in his speech to the OAS that he did not even state clearly that there was a Nicaraguan claim to Costa Rican territory *per se*. His main and reiterated argument was that Nicaragua’s armed forces had not entered Costa Rican territory, since they were stationed on Nicaraguan territory, with the purpose of fighting drug trafficking.

5. Nicaragua asserts that:

“[b]efore the hearings and for many years Costa Rica was aware that the border had not been settled and that Nicaragua was interested in doing so. This subject was addressed at the meetings of the bilateral Commission dating back to 1994 and the last meeting in which this subject was raised was in October 2006. That is why all Nicaraguan maps had the legend that it had not been verified on the ground.”

This paragraph completely misrepresents the situation.

6. In fact the boundary between Costa Rica and Nicaragua was settled by the 1858 Treaty of Limits, and more specifically by the work and proceedings of the Demarcation Commission (1897-1900), as duly recorded in Minute XXVII of 24 July 1900. The process that was undertaken from 1994 to 2004 was the establishment of additional boundary pillars in between the original ones placed by the Demarcation Commission, and even then only from Marker II to Marker XX, i.e. excluding that portion of the boundary where the right bank of the San Juan River constitutes the boundary. Nicaragua’s reference to the land boundary densification process is completely irrelevant.

¹ CR 2011/1, p. 45, para. 24 (Kohen).

7. At the 1994 bilateral Commission meeting no issue relating to the settling (or unsettling) of the land boundaries was addressed. What was agreed upon was on a land boundary densification process. The text states:

“The Presidents coincided in the importance for both countries of the landmark densification process throughout the whole common border, from Marker II until Marker XX” ...”²

Another issue agreed to was the negotiation of the maritime boundary between both countries, both in the Caribbean as well as in the Pacific—again, a completely different matter.

8. The 2006 bilateral Commission meeting did not address issues on the “settling of borders”. What was discussed and agreed to at this meeting was to “organize, within the first semester of 2007, a working program to restore and reposition the main border landmarks as well as the reference landmarks installed in conformity with the Cañas-Jérez Treaty of Limits of 1858 and the Alexander Awards.”³ Another agreement was that IGN and INETER would exchange geospatial and thematic data.

9. Nicaragua further seems to suggest that, because some of its maps contain a statement in their respective legends to the effect that they have “not been verified on the ground”, the legal weight of these maps is diminished. The reason some Nicaraguan maps – and the maps of other countries, including Costa Rica – provide that they have not been verified on the ground is because the maps are drafted in an office, and they are based on aerial photographs, as is clearly the case with the official cartography of Costa Rica and Nicaragua since the 1970s. What cannot be verified by reference to aerial photography are place names, such as the names of towns and so on. Anything that the photographs cannot depict is referred to in the map legend. The physical components portrayed in maps such as rivers, coastlines and so on, are clearly visible from aerial

² Spanish original: “Los Presidentes coincidieron en la importancia que tiene para los dos países la Densificación de Mojoneros a todo lo largo de la frontera común, desde el hito II hasta el hito XX...” Comunicado Conjunto de los Presidentes de las Repúblicas de Costa Rica, ingeniero José María Figueres Olsen y de Nicaragua, señora Violeta Barrios de Chamorro, con motivo de su encuentro en las poblaciones fronterizas de la Cruz y San Juan del Sur, (San Juan del Sur, Rivas, 29 May 1994).

³ Spanish original: “Las Delegaciones acordaron la necesidad de organizar, dentro del primer semestre de 2007 un programa de trabajo de restauración y reposición de los hitos fronterizos fundamentales, así como de los hitos fronterizos de referencia instalados de conformidad con el Tratado de Límites Jeréz-Cañas de 1858 y los Laudos Alexander”.

photography and do not require on-site verification. Moreover, as shown during the hearings,⁴ the existing Nicaraguan map of the area at the smallest scale perfectly matches with satellite photographs, as well as with the relevant Costa Rican map.⁵

10. It is significant in relation to the legal weight to be attributed to the statement that “the map has not been verified on the ground” that INETER issued a 2011 edition of this map this week, in order that the new map should correspond to Nicaragua’s new claim of part of Isla Portillos, in which the same statement is retained.⁶

11. Nicaragua also refers to the “Political-Administrative Division” map of the “Department of Rio San Juan”, claiming that “this was not a map for international borders but one referring to the administrative divisions inside Nicaragua”. However, if the part of Isla Portillos now claimed by Nicaragua were considered to be Nicaraguan, it would surely have been included in the Department of Rio San Juan in this map. It was not.

12. Nicaragua also refers to the reservation formulated by Nicaragua in a footnote of its Counter-Memorial in the *Navigational and Related Rights* case.⁷ But this footnote did not involve a territorial claim. It was (a) a footnote; (b) wholly unspecific; (c) unaccompanied by any map or explanation. In any event, the fact that Nicaragua in the *Navigational and Related Rights* case produced maps depicting the boundary in accordance with the First Alexander Award of 1897 confirms that its boundary claim is a new one.

13. The general issue of the Bays of San Juan del Norte and Salinas, mentioned by Nicaragua in its answer, is also a different matter. Article 4 of the 1858 Treaty of Limits is clear in stating that both bays are “common to both Republics”; to date, Costa Rica has not been officially informed by Nicaragua that it has any different understanding of this matter.

⁴ CR 2011/3, p. 12, paras. 16-17 (Kohen) and CR 2011/1, p. 23, paras. 13-14 (Brenes).

⁵ See Judges’ Folders submitted by Costa Rica on 13 January 2011, tab 3, slide “1981 Satellite Photograph Compared with Nicaraguan Cartography”, and Judges Folders submitted by Costa Rica on 11 January 2011, Vol. III, p. 51.

⁶ Available at:

http://www.ineter.gob.ni/index.php?option=com_content&view=article&id=91&Itemid=225. See Attachment CRI.

⁷ Dispute regarding Navigational and Related Rights (Costa Rica v. Nicaragua), Republic of Nicaragua, Counter-Memorial, vol. I, p. 9, footnote 14.

14. Nicaragua refers once again to a 1971 provisional map produced by Costa Rica's National Geographic Institute (IGN). When this map was presented during the Court's final sitting on 13 January 2011, Nicaragua's counsel was careful to clarify that it was a provisional map.⁸ Nicaragua's answer now neglects this crucial detail. As explained in the attached note from the Director of IGN⁹ the error probably occurred during the printing process outside of Costa Rica; as soon as the mistake was detected this map was withdrawn from circulation. Moreover, as explained in the same note, more detailed cartography takes precedence over the less detailed: the 1970 map, scale 1:50,000,¹⁰ is the basis for and prevails over the 1:500,000 map of 1971. It is essential to recall that the relevant maps of the area San Juan del Norte/Punta Castilla produced and used by both countries until late last year clearly depict the boundary following the true first canal as determined by Alexander and do not show at all the purported new "first caño" artificially created by Nicaragua. The whole cartographic history of the area has been and remains clear since Alexander himself drew a sketch-map as part of his arbitral award; a sketch-map in relation to which Nicaragua maintains a resounding silence.

15. With regard to other maps included in Nicaragua's Judges' Folders of 13 January 2011, Nicaragua does not contend that they depict the "first channel", but indicates in its answer to the question that they "show the disputed area as being located in Nicaragua". These maps in Annexes 4 and 5 of Nicaragua's answers, dated "191?" and "1923", as well as those included in Annexes 7 and 8 of Nicaragua's answers, simply contain a wrong depiction of the boundary in different areas: (1) they draw the boundary line in the east through the Taura River (as Nicaragua had unsuccessfully claimed before E.P. Alexander) and thus as including the whole Isla Portillos within Nicaragua, and (2) they wrongly place the boundary along the area below the Lake of Nicaragua in such a way as to attribute to Costa Rica portions of territory which, according to the demarcation agreed by the Commissions and the Arbitrator Alexander between 1897 and 1900, fall under Nicaraguan sovereignty. The "US Engineer Office Nicaragua Canal Survey 1929-1931 General Map" is not an official map of either Nicaragua or Costa Rica: it is "general" and it is intended to show the "Ruta del Canal" (route of the canal). Furthermore, its inaccuracy with regard to boundaries can be easily demonstrated: the boundary above Lake Nicaragua does not

⁸ CR 2011/4, pp. 8-9, para. 3 (McCaffrey).

⁹ See Attachment CR2.

¹⁰ See Attachment CR3.

follow the one decided by the Demarcation Commission or General Alexander. For their part, maps 10 and 11 annexed to Nicaragua's answers simply do not correspond, in any way, to the geography of the area. It is not even clear whether they depict Laguna Los Portillos, even less any "caño" that could constitute the alleged "first channel" linking that Lagoon with the San Juan River. The boundary on these maps seems to follow the San Juan River until its mouth, without even depicting the Nicaraguan strip of land over Laguna Los Portillos.

16. In short, it is clear from Nicaragua's answer to the first question asked by Judge Simma that Nicaragua did not make, nor attempt to make, Costa Rica aware of its claim before it occupied the Costa Rican territory of Isla Portillos in October 2010.

17. Judge Simma's second question was as follows:

Considering the physical changes in the area of the delta of the San Juan river already known at the time of the Cleveland and Alexander awards, why has Nicaragua, within the last century or so, never made an attempt to negotiate a new course of the boundary, or at least to change its maps?

18. Nicaragua admits in its response to Judge Simma's second question that "*there was no need to negotiate a new course of the boundary since this is clearly spelled out in the Alexander Awards.*" This contradicts Nicaragua's answer to Judge Simma's first question, where Nicaragua says at paragraph 3: "*Before the hearings and for many years Costa Rica was aware that the border had not been settled and that Nicaragua was interested in doing so.*"

19. Nicaragua's answer unequivocally confirms that it never made any attempt either to negotiate a new course of the boundary or to change its official cartography. It also confirms that Nicaragua never communicated to Costa Rica any intention of doing so.

20. Judge Simma's third question was as follows:

The dredging project concerning the San Juan river relates to a shared environment. In light of this, why was the Nicaraguan Environmental Impact Study prepared from 2006 onwards and the permit of the Environment Ministry of December 2008 for the San Juan dredging project to proceed, as well as the

extension of the permit to the cleaning of the “caño”, never communicated to Costa Rica?

21. As with the answer to the previous question, Nicaragua’s response attempts to restate some of the arguments presented during the oral hearings but fails to confront the question asked. None of the excuses proffered by Nicaragua can be considered acceptable. The fact is that Nicaragua never presented Costa Rica with the Environmental Impact Study (EIS) prepared in 2006, in spite of Costa Rica’s repeated requests.

22. When the Nicaraguan authorities first announced plans for a dredging project on the lower course of the San Juan River in 2006, Costa Rica immediately communicated with Nicaragua regarding the project, and particularly requested that Nicaragua furnish Costa Rica with all pertinent technical information related to the dredging project. This was done through a diplomatic note from Costa Rica’s Foreign Minister dated 26 January 2006.¹¹

23. When dredging works were announced for a second time in August 2009, Costa Rica again requested, through a diplomatic note dated 27 August 2009, that Nicaragua provide the technical information on the project, particularly in light of the grave statements attributed to two Nicaraguan officials in charge of the project.¹²

24. Finally, on 12 July 2010, following the announcement that dredging works were scheduled to begin shortly, Costa Rica requested the technical studies for a third time.¹³

25. Nicaragua states that the existence of an EIS was “hardly a secret” since the document was made available to the public by means of public notices in Nicaraguan territory for a period of 7 days, and that it is thus “difficult to imagine that Costa Rica...was not aware of...the study”. However, according to the Nicaraguan press, the EIS was kept a “secret of State”.¹⁴ In any event, basic “awareness” of the existence of an EIS is not sufficient: Costa Rica requested that it be provided with a copy of an EIS, and Nicaragua refused to provide it.

¹¹ Tab 22, Judges’ Folders for Costa Rica’s presentation, 11 January 2011.

¹² See PM1, Diplomatic Note sent by Bruno Stagno Ugarte, Minister of Foreign Affairs and Worship, Costa Rica to Samuel Santos López, Minister of Foreign Affairs, Nicaragua, 27 August 2009.

¹³ Tab 25, Judges’ Folders for Costa Rica’s presentation, 11 January 2011.

¹⁴ *La Prensa*, Nicaragua, 28 October 2010 “Estudio Ambiental Avala Dragado” available at: <http://www.laprensa.com.ni/2010/10/28/nacionales/41965>. See Attachment CR4.

Questions posées par M. le juge Bennouna

26. Judge Bennouna asked three questions.

Est-ce que le Nicaragua entreprend actuellement des travaux sur le canal dit «First Caño» y compris ceux relatifs à la construction et à l'élargissement de ce canal, l'abattage d'arbres, l'enlèvement de la végétation ou de la terre, et le déversement des sédiments?

27. Nicaragua asserts that there is not “à l’heure actuelle” any work being undertaken on the so-called “First caño”. It is important to note the disclaimer: Nicaragua does not undertake that no works will be undertaken on the construction or enlargement of the canal in future. Nicaragua refers to its Agent, who stated that: “In so far as [the dumping of sediment] refers to any operations during the cleaning of the channel, these are over and finished.”¹⁵ But of the other works – the expansion of the canal, the felling of trees, and most significantly, the undertaking of dredging works through the new canal – Nicaragua was, and remains, silent.

28. Costa Rica observes that there is clear documentary evidence to suggest that the works undertaken by Nicaragua for the construction of the “caño” are far from complete. The permit extension issued by MARENA in October 2009¹⁶ authorises the National Port Authority (the State-owned company undertaking the construction and dredging works) to construct a canal 1,560 metres long and 30 metres wide, and in some places, 6 metres deep.¹⁷ The permit extension expressly notes that there will be work performed by a dredge.¹⁸ No such work has yet occurred on the “caño”, which at present is only 1 metre deep and approximately ten metres wide (although this increases every day as the banks are washed away by new water flow). As such, further work is to be anticipated.

29. This documentary evidence is supported by press statements made by the head of the dredging works, Mr. Eden Pastora,¹⁹ in particular his statement of 9 January 2011 that:

¹⁵ CR 2011/4, p. 37 (para. 18) (Argüello). See also CR 2011/2, p. 16 (para. 36) (Argüello), where the same phrase is repeated.

¹⁶ Documents Republic of Nicaragua, 4 Jan. 2011, Doc. 13: Espinoza Affidavit, Ann. 9, last page.

¹⁷ Documents Republic of Nicaragua, 4 Jan. 2011, Ann. 8, doc. No. 13.

¹⁸ Ibid.

¹⁹ CR2011/3 p. 28 (paras. 25-26) (Crawford).

“With a fourth [dredge], that will come at the end of February, *opening the channel on the sea and the sand bar where the San Juan River will empty*. What would have taken us three to four years, we are going to do in one year”.²⁰

Such statements are clearly indicative of an intention to pursue further works of construction and dredging in the Isla Portillos region, for some time to come: at least one year; and with additional dredges.

30. There is a real risk that work related to the construction or enlargement of the “caño” is scheduled to continue at some time and will continue without the Court’s order for Provisional Measures.

31. Finally, Nicaragua says that the felling of trees is linked to the building of the “caño”, but many trees were cut down on Isla Portillos although they were not in the direct path of the canal. The question remains unanswered: why did Nicaragua cut down those trees if there were not necessary for the “caño”? Again, this suggests that there are further works scheduled to take place in that area.

32. Judge Bennouna’s second question was as follows:

Est-ce que le Nicaragua maintient sur la portion du territoire dénommée «l’île de Portillos» des troupes armées ou d’autres agents, quels qu’ils soient?

33. Nicaragua’s response in this respect is unsatisfactory. Nicaragua does not say that it does not maintain military personnel in the area. Nicaragua states only that no troops or other agents are “stationed” in the relevant area and that there is no intention to establish a military post in the region. It can only be presumed that Nicaragua means a permanent military post, as this was emphasised during the oral proceedings.²¹ In fact Nicaragua maintains a permanent military post in the locality of San Juan de Nicaragua, on the left bank of the San Juan River and a mere one kilometre from the occupied area. It is all too easy for Nicaragua, if not prevented by way of an order for Provisional Measures, to send troops to the relevant area at any time.

²⁰ *La Prensa*, Nicaragua, 9 January 2011: “Another three dredges to the [San Juan] river”. Tab 80, Vol. I, judges’ folders, 11 Jan. 2011 (emphasis added).

²¹ CR 2011/1, p. 13 (para. 28) (Argüello); CR 2011/4, p. 37 (para. 15) (Argüello).

34. And indeed it continues to do so, whatever the Agent of Nicaragua may say. In its response, Nicaragua claims, as it did during the course of the oral proceedings,²² “*Aucune troupe nicaraguayenne ne stationne actuellement dans la zone en question.*” Costa Rica is able to provide the Court with clear evidence to the contrary. In a flyover conducted by the Costa Rican police on 19 January 2011, photographs were taken that indicate not merely the presence of Nicaraguan troops on Isla Portillos, but a marked increase in the size of their encampment since October 2010. The photographs are provided at attachment **CR5**.

35. Costa Rica notes that although Nicaragua claims (contrary to the facts) that no armed troops or other officials are present on Isla Portillos at the present time, it is currently acting as though it were the State having authority over the territory. For these reasons, an order for Provisional Measures is still required in order to ensure that the *status quo ante* is maintained pending the Court’s judgment on the merits. Nicaragua has, by establishing a military camp and planting the Nicaraguan flag on the right bank of the San Juan River, has demonstrated an intention to claim the region, by force if necessary. The entirety of Isla Portillos has hitherto been expressly recognised by both States as the territory of Costa Rica. Before the occupation by Nicaragua, the State exercising jurisdiction over the relevant area in accordance with the internationally recognised boundary was Costa Rica.

36. An order for Provisional Measures is required to ensure that Nicaragua is not in a position to maintain or re-establish a military presence on Isla Portillos or to exercise State activities through its agents there.

37. Judge Bennouna’s third question was as follows:

Est-ce que le Nicaragua s’engage à ne pas entreprendre de tels travaux, ni à envoyer ses troupes armées ou d’autres agents sur «l’île de Portillos», jusqu’à ce que la Cour rende son jugement au fond ?

38. Judge Bennouna’s question asks Nicaragua to undertake – i.e. to commit – not to perform any of the relevant acts in the period prior to final judgment on the merits. In response, Nicaragua says twice that it has no intention of sending troops or other agents to the area. It says nothing at all as to the future undertaking of works, a subject expressly mentioned by Judge

²² CR 2011/2, p. 13, para. 38 (Argüello) CR 2011/4, p.37, para. 15 (Argüello)..

Bennouna. Even as to the sending of troops or other agents, Nicaragua declines to make any commitment whatsoever. In effect, its answer to Judge Bennouna is: No. Nicaragua announces its intention to “*faire respecter la loi, de lutter contre le trafic de la drogue et le crime organisé et pour la protection de l’environnement*” in the relevant area, even as it announces that it is possible to do so through the waters of the river. As it made clear during its oral observations, Nicaragua considers that the waters of the artificial canal are Nicaraguan.²³ Clearly, Nicaragua announces that it will continue to exercise authority within the relevant area.

39. In the circumstances, Nicaragua’s repeated refusal to make any commitment or to enter into any engagement in relation to the sending of armed troops or other personnel powerfully reinforces the case for Provisional Measures.

40. Furthermore, far from disowning the “White Book”, Nicaragua actually annexes it to its response. The Court is entitled to take into account the vitriolic statements of Nicaragua, which suggest that it has a particular agenda informing its conduct in relation to the construction of the canal. Taken together with the statements of Mr. Eden Pastora,²⁴ there are clear grounds for considering that Nicaragua intends to carry out further dredging and construction works as soon as it can. An order for Provisional Measures is required to ensure that Nicaragua will refrain from imposing a *fait accompli* before the Court can reach the merits stage.

Questions put by Judge Greenwood

41. Judge Greenwood’s first question was:

First, at what date did Nicaragua first form the opinion that what it has described as the “First Caño” was the boundary between itself and Costa Rica in accordance with the First Alexander Award?

42. Nicaragua responds that in its opinion the “First Caño” (that is to say, the canal built in late 2010) goes back to the First Alexander Award: this has been “a settled matter since the time the Umpire-Engineer found that the border followed ‘the first channel met’ until reaching the River proper”. This fails to answer the Judge’s question, which is not what the First Alexander Award said but when Nicaragua first formed the opinion that this is what it said. The answer to

²³ CR 2011/2, p. 45, paras. 42-43 (Reichler).

²⁴ CR2011/3 p. 28 (paras. 25-26) (Crawford).

Judge Greenwood's question is: the second half of 2010, when Mr Pastora persuaded the President of Nicaragua to support his thesis. Nicaragua effectively concedes this in its response to Judge Simma's first question, when it refers to the White Book, published on 26 November 2010, after the present proceedings were commenced.

43. In any event the Nicaraguan thesis finds no support in law, in logic or in the evidence at the disposal of the Court.

44. As a matter of law, the boundary was settled by the terms of the first Alexander Award of 1897, including its annexed sketch map which is unequivocal but which Nicaragua simply ignores.

45. As a matter of logic, either there was a "caño" in existence in 1897 where Nicaragua now claims the "First Caño", or there was not. Alexander, who carefully surveyed the Laguna, neither mentions nor shows one there. If there was one, he deliberately ignored it. If there was not, he could not possibly have intended it as the boundary. Alexander clearly designated where the true first canal linking the Lagoon with the San Juan River was and consequently determined where the boundary was in the relevant area. The idea that, whenever another "caño" formed or was constructed, it would become the boundary (a) is inconsistent with the principle of finality of boundaries articulated by Alexander, (b) finds no support whatsoever in the Award or in the practice of the Parties, and (c) also finds no support as a fact in the evidence produced by Nicaragua.

46. As an evidentiary matter, not a single map, official or unofficial, Nicaraguan or Costa Rican, has ever depicted Nicaragua's recently-built "caño" as that referred to by Alexander. If one thing is clear, it is that the map attached to Minute X in the records kept by the Demarcation Commission²⁵ entirely contradicts Nicaragua's assertion. Indeed, Nicaragua is unable to say when this alleged caño came into existence.

47. To Costa Rica's knowledge, Nicaragua first formed the legal opinion that what it has described as the "first caño" was the boundary between Costa Rica and Nicaragua during, or just prior to, the oral proceedings, and in any event, not earlier than October 2010. During the course of the oral hearings, Nicaragua presented no evidence about when it formed this opinion, and

²⁵ Tab 40, Vol. II, judges' folders, 11 Jan. 2011, p. 33.

none can be found in its official records or in diplomatic correspondence with Costa Rica. Until November 2010, the Nicaraguan website for INETER showed that all Nicaraguan official maps were consistent with the Alexander records and Costa Rican cartography. This website was taken down shortly before commencement of the oral proceedings. It was listed as “under construction” during last week’s oral hearings,²⁶ and now has a brand new section dedicated entirely to “Harbor Head”.²⁷ The former INETER website remains archived, and is available on the internet. All of the maps on the archived website correspond to the documentary evidence produced by Costa Rica. That is, each shows Isla Portillos as Costa Rican territory. Costa Rica attaches screen shots of the archived INETER website and copies of the relevant maps taken from that website.²⁸

48. Even the maps attached to Nicaragua’s EIS of 2006, which was approved in December 2008, show clearly that the border in the relevant area reflects the border agreed by the Demarcation Commission and Alexander, and that there were no “caño”, where Nicaragua has built it. As a legal matter, it appears that Nicaragua only developed the idea of a “first caño” since proceedings were brought against it by Costa Rica.

49. Finally, Nicaragua is reduced to relying on a 1906 report filed by a Costa Rican official on an entirely unrelated matter. Whether or not “canõs” are “easy to clog up” is entirely irrelevant to the question of whether or not Nicaragua had ever previously formed the opinion that the alleged “first caño” formed the international boundary.

50. Judge Greenwood’s second question was as follows:

Secondly, did it notify Costa Rica of that opinion? And if so, when and by what means?

51. Nicaragua has never notified Costa Rica, either officially or unofficially, of any change to its views or opinion regarding of the position of the international boundary, in particular changes to the boundary in the specific area of Isla Portillos. Costa Rica only came to learn officially of

²⁶ CR 2011/1, p. 23, para. 15 (Brenes). See Attachment CR6.

²⁷ See website of INETER, available at:

http://www.ineter.gob.ni/index.php?option=com_content&view=article&id=91&Itemid=225.

See Attachment CR6.

²⁸ See archived website of INETER, available at:

<http://web.archive.org/web/20071023062703/http://ineter.gob.ni/>.

See Attachment CR7.

this opinion during Nicaragua's first presentation of its case to the Court on the afternoon of 11 January 2011.

52. Nicaragua admits as much. In the first paragraph to Judge Simma's second question, Nicaragua states the following:

"Nicaragua considers that there was no need to negotiate a new course of the boundary since this is clearly spelled out in the Alexander Awards".

And in fact, there have in fact been no such negotiations, within the framework of the bilateral Commission or otherwise.

53. Thus, the simple answer to Judge Greenwood's second questions is: No. Prior to 11 January 2011, Nicaragua never communicated to Costa Rica by any means, officially or unofficially, the opinion that what it has recently – and wrongly – described as the "first caño" constitutes the boundary between Costa Rica and Nicaragua.

Maps submitted by Nicaragua on 18 January 2011

54. Finally, Costa Rica will comment on certain maps submitted by Nicaragua which are said to show "the disputed area as being located in Nicaragua".

55. Costa Rica first observes that maps 1 and 2 are irrelevant, as they do not show the Isla Portillos region. Map 3 has been addressed in paragraph 14, above. Otherwise, Costa Rica notes that not one of the maps numbered 4 to 13 is an official map of Nicaragua or Costa Rica. In that respect, their probative value in relation to the location of an international boundary is zero.

56. Nonetheless, Costa Rica makes the following observations in relation to each of the maps:

- Maps 4, 5 and 9: These maps indicate not the international boundary or course of the San Juan River, but the intended placement of an inter-oceanic canal that Nicaragua wished to construct, to compete with the Panama Canal. The Court will observe that in maps 4 and 5 there is a box marked "San Juan del Norte" on each map, in which no "caño" is visible on Isla Portillos.
- Map 6: This map also shows the location of a planned inter-oceanic canal. The line intersecting "Harbor Head Lagoon" and extending into the Caribbean Sea

indicates only the placement of the maritime boundary. In any event, no “caño” is visible on Isla Portillos.

- Maps 7, 8, 10 and 13: These maps do not even show Laguna Los Portillos, let alone any “caño”, and are erroneous geographically.
- Map 11: In addition to being geographically unsound, this map in fact colours all of Isla Portillos white, to indicate Costa Rican territory, in spite of the uncertain boundary line (which for the most part is placed some way inland of the right bank of the San Juan river). The only visible body of water is the Bay of San Juan del Norte.
- Map 12 was produced by petroleum corporation Texaco and for that reason alone cannot be considered by the Court as a genuine demarcation of an international boundary. In any event, the map is demonstrably incorrect geographically, and marks the boundary a significant distance below the right bank of the San Juan River.

List of Attachments:

- CR1.** *San Juan de Nicaragua*, scale 1:50,000, INETER, 2011
- CR2.** Original and English translation of note prepared by the acting Director of IGN, Costa Rica
- CR3.** Official Map of Costa Rica, scale 1:50,000, IGN, 1970
- CR4.** Original and English translation of extract of *La Prensa*, Nicaragua, 28 October 2010, "Estudio Ambiental Avala Dragado" available at:
<http://www.laprensa.com.ni/2010/10/28/nacionales/41965>
- CR5.** Five photographs taken on 19 January 2011 of Nicaraguan troops on Isla Portillos
- CR6.** Screen shot of INETER website "under construction", 9 January 2011
- CR7.** Screen shot of new INETER website "Harbor Head" section, 19 January 2011
- CR8.** Original and English translation screen shots from former INETER website together with maps taken from website, 15 October 2007

The undersigned Agent certifies that the above attachments are true copies and conform to the original documents and that the translations into English made by Costa Rica are accurate translations.

Ambassador Jorge Urbina

Co-Agent of Costa Rica

20 January 2011



Instituto Geográfico Nacional
Apdo Postal 2272-1000 - San José, Costa Rica
Teléfono: 2523-2619 – Fax: 2221-0087



San José, 18 de enero de 2011

OFICIO No. 11-0042

A Quien Interese

Por medio de la presente el Instituto Geográfico Nacional, se refiere al Mapa Físico – Político a escala 1:500.000, que en su Edición Provisional de 1971, contiene un error en el trazado donde se muestra el límite entre Costa Rica y Nicaragua en el sector de Punta Castilla (Isla Portillos/Isla Calero) y que fue presentado por Nicaragua como el Mapa N° 3.

Es importante recalcar que este mapa como bien se refleja en la leyenda de la parte superior derecha del mismo, claramente indica que se trata de una **Edición Provisional**, por tanto sujeta a revisión, actualizaciones, cambios, mejoras, etc., en pocas palabras, es un borrador del mapa.

Según las consultas e investigación realizadas en nuestra institución, relacionados con esta situación, se determinan los siguientes aspectos:

Las bases cartográficas de este mapa fueron preparadas por el IGN. Sin embargo, dado que en aquel tiempo el país no contaba con una imprenta adecuada al tamaño de impresión de este tipo de mapas, estos mapas se enviaban a imprimir fuera del país, por lo que errores como el mencionado o cualquier otro tipo de manipulación y alteración, no podían detectarse hasta que se recibiera el total de impresiones.

El método que se emplea para la elaboración de los mapas es el conocido tradicionalmente como separación de color, el mismo consiste en la preparación de diferentes láminas que componen el mapa según su color de impresión. El material que se emplea para el diseño en la lámina correspondiente al trazado del límite internacional, es una película que contiene una retícula o trama, la cual es un material positivo o negativo en película flexible adherida con cera, la que se debe colocar en una lámina de película transparente. Por ello, dicho material adhesivo se puede ver afectado por la temperatura o por una inadecuada manipulación, facilitando su desplazamiento.

Es necesario agregar que una vez que dicho error fue detectado, los mapas fueron retirados de su venta y circulación, no obstante, ya se habían distribuido algunos de ellos.

Sin embargo, el trazado oficial del límite fronterizo en el sector de Isla Portillos / Isla Calero es el que se muestra en la I Edición de la hoja Punta Castilla (3448-I) a escala 1:50.000, que precisamente data del año 1970 y es en efecto la base cartográfica y fuente del mapa de Costa Rica 1: 500.000 del año 1971. La escala 1:50.000 es la de mayor detalle y constituye la cartografía Básica Oficial de nuestro país para todos los efectos de planificación, legales, toma de decisiones, etc.

INSTITUTO GEOGRÁFICO NACIONAL

Marta E. Aguilar V.



Geóg. Marta E. Aguilar V.
Encargada Dirección General

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para personas con discapacidad



Instituto Geográfico Nacional
Apdo Postal 2272-1000 - San José, Costa Rica
Teléfono: 2523-2619 – Fax: 2221-0087



San José, 18 January 2011

OFICIO No. 11-0042

To Whom It May Concern

In this note, the National Geographic Institute refers to the Physical - Political Map 1:500.000 scale, which in its 1971 Provisional Edition, contains an error in the contour of the boundary between Costa Rica and Nicaragua in the Punta Castilla sector (Isla Portillos / Isla Calero) and that was submitted by Nicaragua as Map No. 3.

It is important to emphasize that this map, as is well reflected in the legend at the top right, clearly indicates that this is a **provisional edition**, therefore subject to revision, updates, changes, improvements, etc., in other words, this is a draft map.

Based on inquiries and research performed in our institution in relation to this situation, it was possible to determine the following:

- The cartographic bases of this map were prepared by the IGN. However, since at that time the country did not have a printer suitable to print maps of this size, they were sent to be printed outside the country, so errors like the above or any other type of manipulations and alteration could not be detected until the IGN received all the printed versions.
- The method of preparation of such maps is traditionally known as color separation, which is the preparation of the different layers that make up the map in accordance with the color to be printed. The material used in the design of the layer corresponding to the international border is a film containing a grid, which is a positive or negative material on a flexible film that is attached with wax to a sheet of transparent film. Therefore, the adhesive can be affected by temperature or by inadequate handling, facilitating its movement.
- It should be added that once the error was detected, the maps were withdrawn from sale and circulation, however, some of them had already been distributed.

However, the official drawing of the border limit in the area of Isla Portillos / Isla Calero is shown in the First Edition of the Punta Castilla sheet (3448-I) at 1:50.000, which precisely dates from 1970 and is in fact the cartographical base and the source of the 1971 Costa Rica 1: 500,000 map. The scale 1:50.000 is the most detailed one and is the Official Basic cartography in our country for purposes of planning, legal, decision making, etc.

NATIONAL GEOGRAPHIC INSTITUTE

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Nacionales

Estudio ambiental avala dragado

Nicaragua dice que Costa Rica invadió

DEPÓSITOS DE ARENA

El dragado del río San Juan contará con 21 depósitos de arena, de un total de 42 previamente visualizados. El estudio de impacto ambiental asegura que todos están en territorio nicaraguense, esparcidos en los últimos 42 kilómetros del recorrido del caudal.

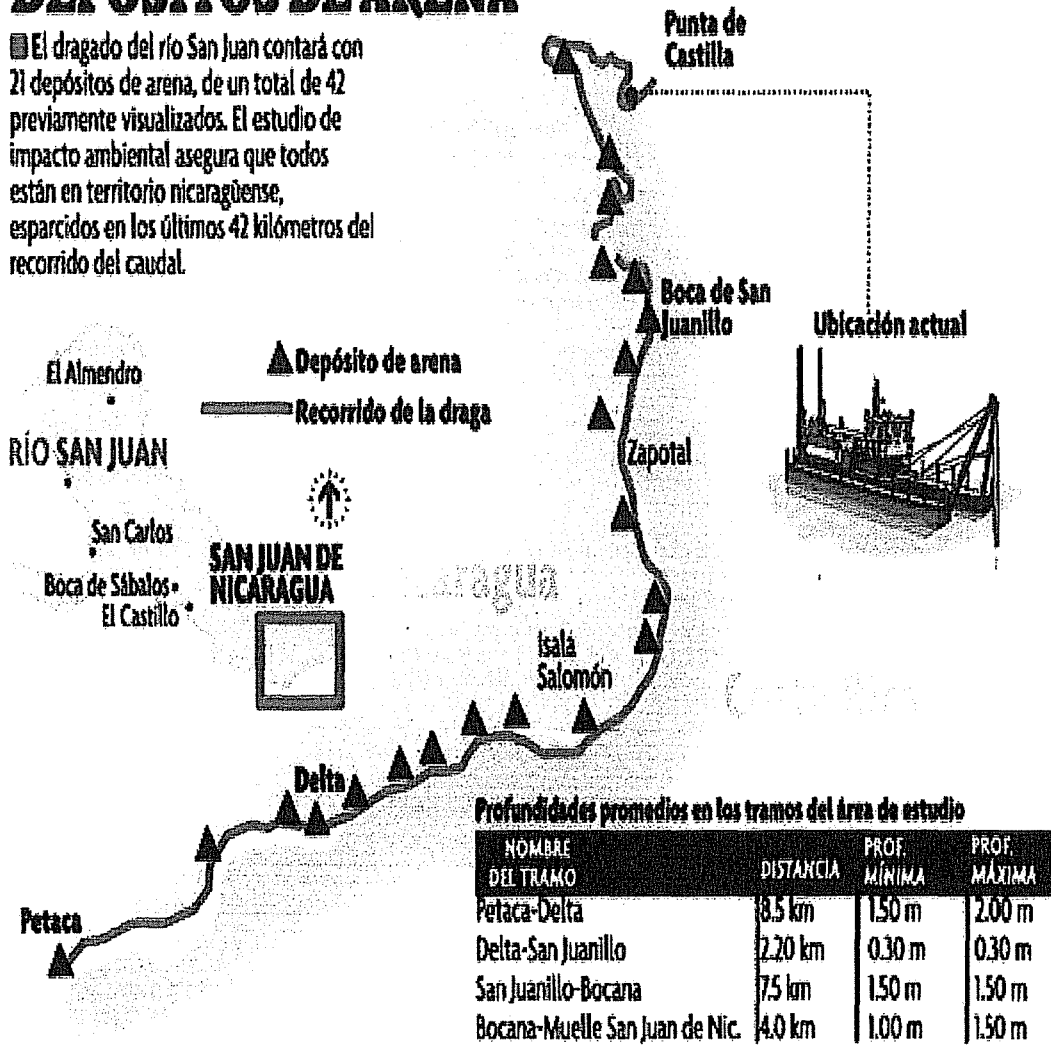


Gráfico: LA PRENSA / TRISWAROCK RODRIGUEZ

[Ver infografía completa](#)

Por Wilder Pérez y Josué Bravo

El dragado del río San Juan es como una operación dolorosa pero necesaria. Al menos así lo indica el estudio de impacto ambiental, realizado por varias instituciones estatales, a fin de causar los menores daños en la zona.

Dicho estudio todavía es "un secreto de Estado" para el Gobierno de Nicaragua, pero a pesar de todo LA PRENSA tuvo acceso al mismo.

Cuando uno le echa un vistazo a los recuadros que indican la intensidad de los daños, identificados en rojo los peores y azul los mínimos, se observa que durante el dragado casi todos los valores están "colorados", pero cambian al final del proceso.

En las conclusiones del mismo se indica que el impacto ambiental en la zona del dragado "se considera de gran intensidad, compensable, produce un efecto puntual, su permanencia es en el tiempo es temporal, su manifestación es inmediata, la restauración trae beneficios al medio ambiente".

Respuesta a Costa Rica

Nicaragua aseguró que más bien ha sido Costa Rica el país que ha violado su territorio con la incursión a suelo nicaragüense de tropas de las fuerzas armadas costarricenses y exige que estos hechos no se repitan.

Tal afirmación es parte de la respuesta que ayer miércoles Nicaragua entregó en la Cancillería costarricense, en la que además propone "se retomen a lo inmediato las acciones de densificación y señalamiento de los hitos fronterizos (amojonamiento), conforme a los derechos establecidos en el tratado de límites Jerez-Cañas y sus instrumentos laudo Cleveland y laudos Alexander".

La nota está firmada por el canciller por ley de Nicaragua, Manuel Coronel Kautz, y fue entregada por el embajador Harold Rivas al también canciller por la ley de Costa Rica, Carlos Rovessi.

En la nota Nicaragua rechaza los argumentos de la protesta de Costa Rica de la semana pasada, en la que asegura que la labores del dragado en río San Juan afectaban su territorio porque "el sedimento está siendo expulsado y depositado en suelo costarricense a través de una tubería que ingresa al interior de dicha finca (Aragón)".

Según la nota de ayer, las labores realizadas por Nicaragua en su frontera sur son de limpieza de su río San Juan y lucha contra el narcotráfico.

"Al respecto, el Gobierno de Nicaragua rechaza categóricamente las afirmaciones contenidas en dicha nota diplomática (la enviada por Costa Rica la semana pasada), ya que todas las actividades dirigidas a la lucha contra el narcotráfico, así como la limpieza del río San Juan, se han realizado en territorio nicaragüense", añade la nota.

"El Gobierno de Reconciliación y Unidad Nacional por este medio expresa su más enérgica protesta por las reiteradas violaciones de tropas de las fuerzas armadas costarricenses a territorio nicaragüense. El Gobierno de Nicaragua exige que hechos como este no vuelvan a repetirse", añade.

Como elementos adicionales para demostrar violaciones a su territorio, Nicaragua recordó que en días pasados incursionaron a territorio nicaragüense dos oficiales armados del Organismo de Investigación Judicial, quienes fueron detenidos durante actividades de vigilancia fronteriza y devueltos a las autoridades costarricenses.

Según los análisis, la draga removerá aproximadamente un millón de metros cúbicos de arena, que será depositada en 21 sitios despalados en la ribera norte del río San Juan, en áreas que juntas suman casi medio millón de manzanas de tierra.

La ruta del dragado será de 42.0 kilómetros desde Punta Petaca hasta San Juan de Nicaragua, sin embargo hay sitios que no será necesario tocar, por lo que el área de intervención real aparentemente será menor.

La idea es formar un canal con una profundidad de dos metros, con 30 metros de ancho en la parte superior y un fondo de 20 metros de ancho.

Con esto se cumplirían los objetivos de aumentar la profundidad, el caudal y la libre circulación de animales acuáticos de la zona, como el manatí, el tiburón y el pez sierra, especies llamativas que fueron perjudicadas hace 60 años, cuando la salida de este cuerpo de agua fue obstruida en beneficio del río Colorado, de Costa Rica.

A pesar del nerviosismo que el dragado ha provocado en Costa Rica, el estudio indica que, a lo sumo, el mayor impacto que sufriría el país del sur es la reducción del caudal del río Colorado, que sería mínima.

"No perjudica de manera sustancial el caudal del río Colorado, ya que únicamente tomaremos un cinco por ciento del caudal total para que fluya, garantizando la navegación del río San Juan de manera permanente", indica.

Pese a esto, la semana pasada el finquero Marco Reyes, un joven de unos 23 años que posee doble nacionalidad, denunció que Edén Pastora, quien dirige las labores de dragado en el río San Juan, incursionó violentamente a Finca Aragón en compañía de oficiales del Ejército. Costa Rica, que no ha podido verificar la incursión militar, afirma que hubo daños ambientales en la mencionada finca, la cual reclaman como que está dentro de su territorio ambos países.

NICARAGUA RESPONDE A PROTESTA TICA

La Cancillería tica confirmó que recibió a las once de la mañana de ayer una respuesta a la nota de protesta que el 21 de octubre pasado remitió al Gobierno de Nicaragua, por medio del embajador Harold Rivas Reyes.

Un comunicado despachado desde la oficina de prensa dice que el Ministerio de Relaciones Exteriores "ha iniciado de manera inmediata el análisis del texto con sus equipos jurídicos, de diplomáticos y autoridades de otras dependencias del Estado, para en su momento responder con determinación en la defensa de los intereses nacionales. El Ministerio de Relaciones Exteriores, como lo ha hecho desde el inicio de este episodio, ha emprendido todas las acciones para concertar una sólida posición de Estado", añade la información.

En la respuesta entregada por Rivas en la Cancillería costarricense Nicaragua rechaza los señalamientos de haber violado la soberanía de Costa Rica y a la vez rechazó reiteradas violaciones de tropas de las fuerzas armadas costarricenses a territorio nicaragüense.

Nicaragua también solicitó a Costa Rica retomar acciones para delimitar la frontera de acuerdo con tratados internacionales y aseguró que seguirá dragando el río San Juan.

La respuesta de Nicaragua a los reclamos de Costa Rica dice en parte que "Nicaragua, respetuosa de los principios del Derecho Internacional, continuará las labores de limpieza en el río y resguardará los límites y soberanía de Nicaragua establecidos en el tratado de límites Jerez-Cañías, y sus instrumentos laudo Cleveland y laudo Alexander. De igual manera, Nicaragua continuará resguardando y defendiendo los límites y soberanía en todo el territorio nacional".

De cualquier manera, el estudio de impacto ambiental avala las acciones de dragado del río San Juan, aduciendo que la mayoría de los impactos ambientales serán temporales, y la fauna será la mayor beneficiada con estas obras.

Esto ya lo habían expresado algunos de los biólogos más conocidos en Nicaragua, como Jaime Incer Barquero y Kamilo Lara, así como el Instituto Nicaragüense de Estudios Territoriales (Ineter), que coincidieron en que el país lo que hace es restablecer los ecosistemas que existían antes de que el río Colorado fuera dragado en Costa Rica.

Ver en la versión impresa las páginas: 1 A ,12 A

“Estudio Ambiental Avala Dragado”

La Prensa, 28 October 2010

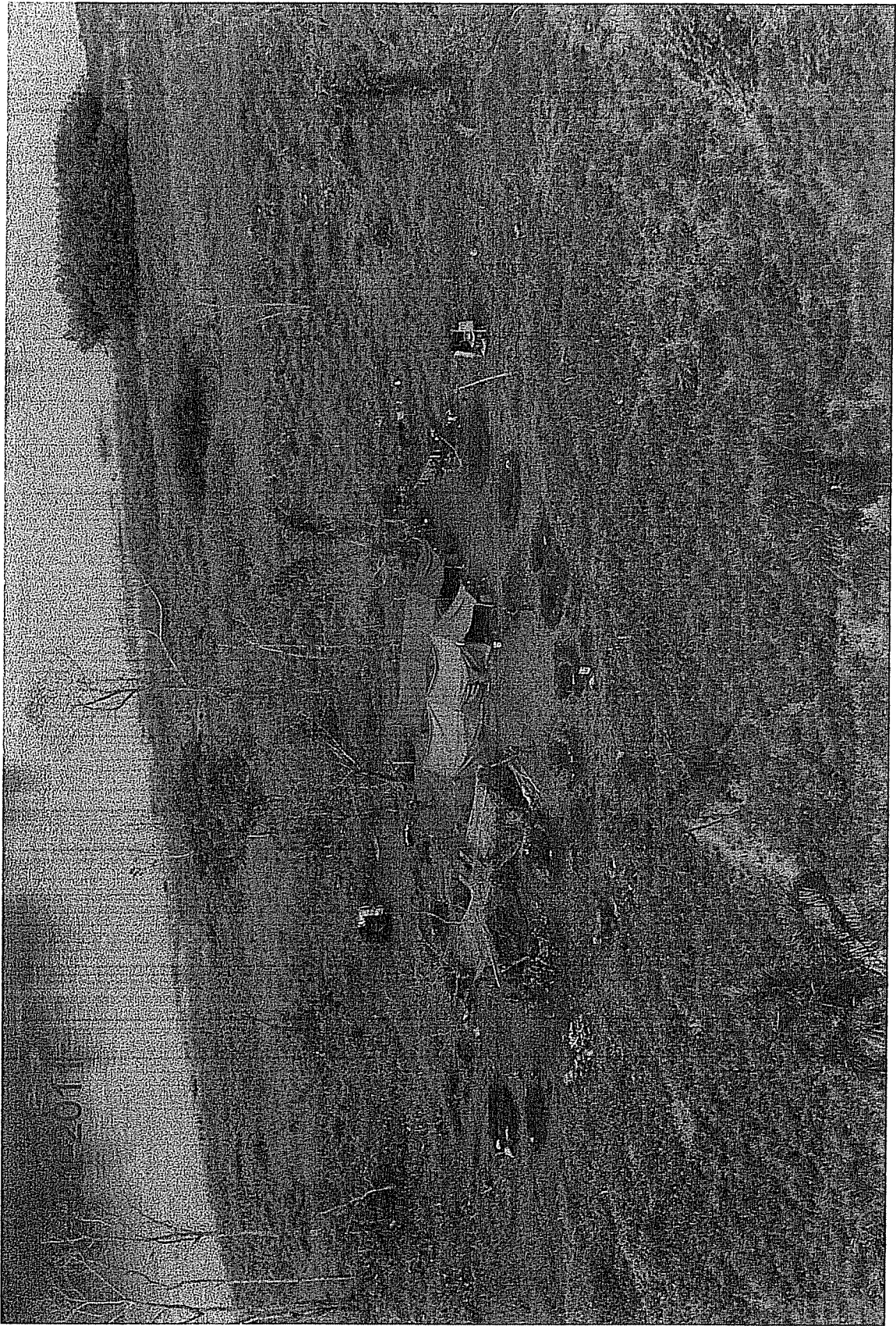
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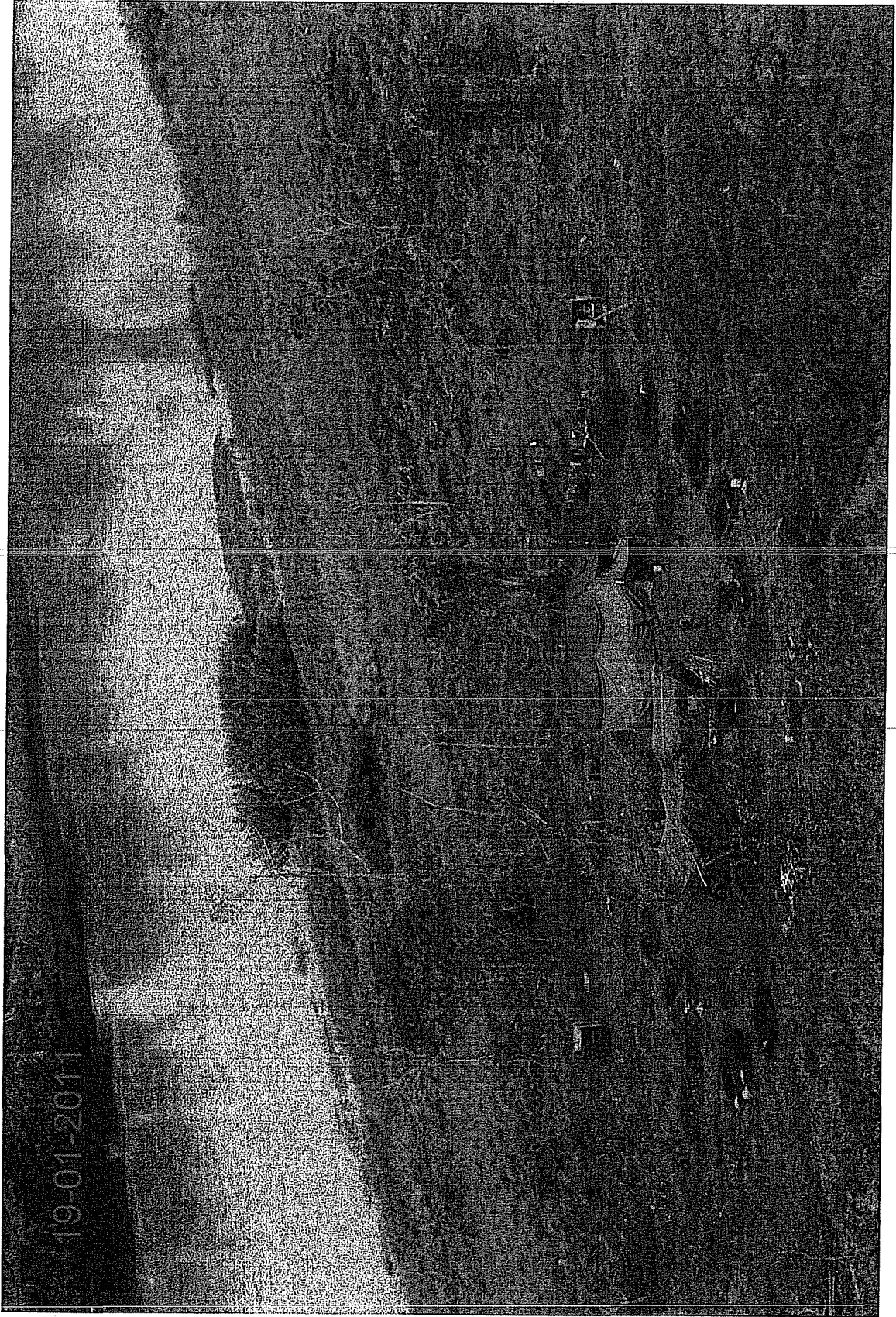
[...]

The dredging of the San Juan River is like a painful but necessary operation. At least so it is described in an Environmental Impact Study, prepared by several State institutions, so as to cause the least damage in the zone.

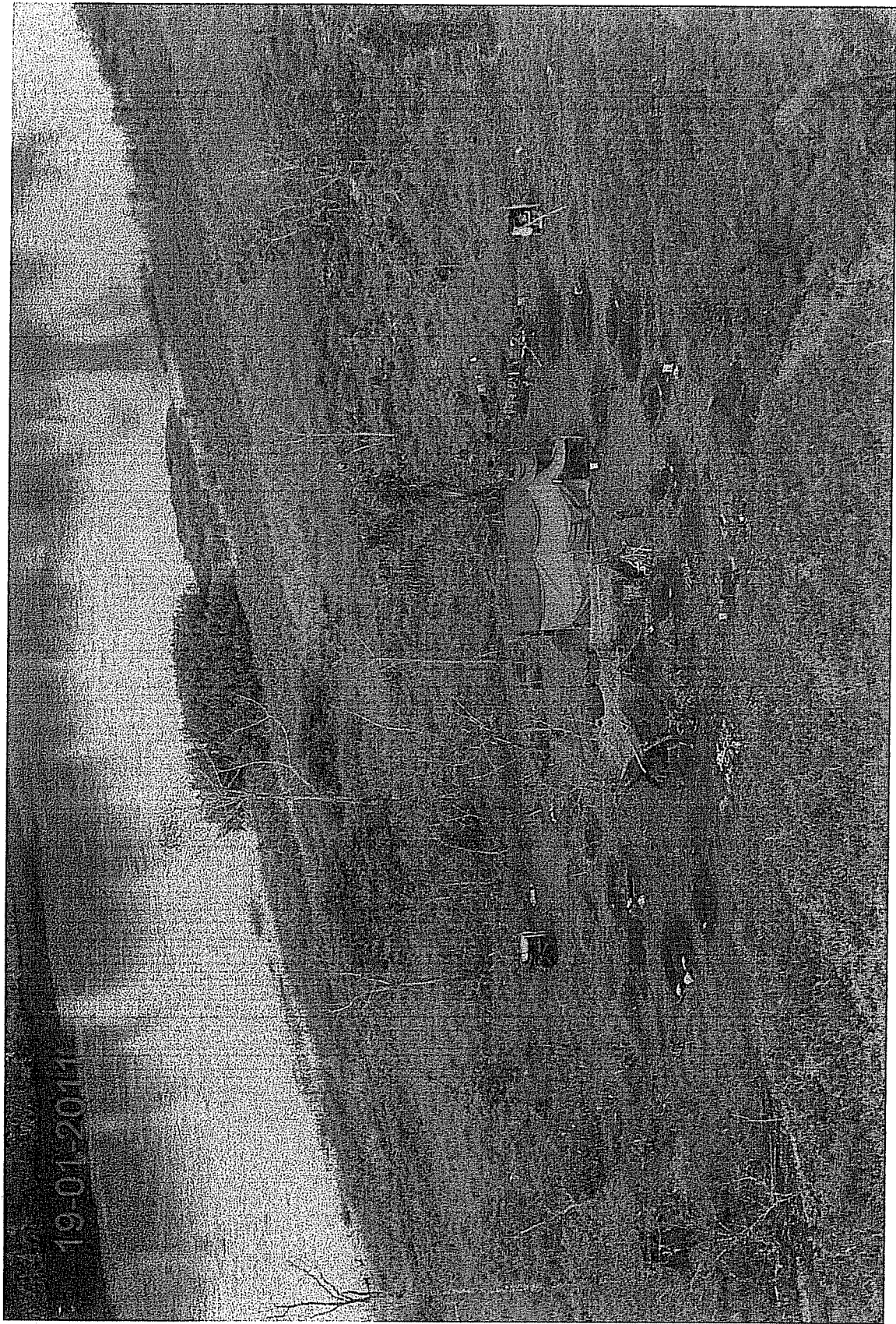
Said study is still a “secret of State” for the Government of Nicaragua, but in spite of this LA PRENSA had access to it.

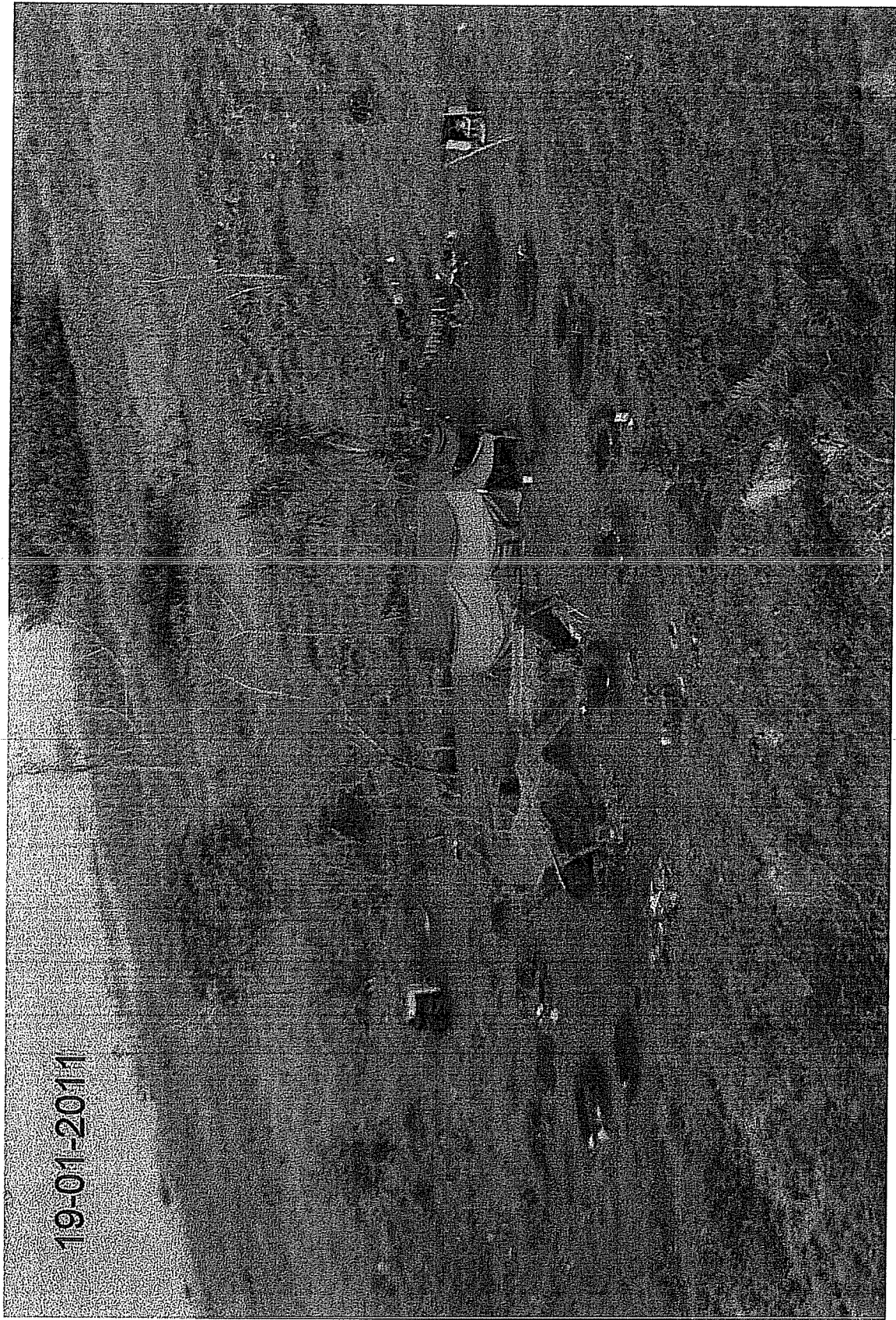
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	China-Taiwán y Hicragua: en áreas protegidas y zonas	Mapas Topográficos		Mapas Topográficos		
	Capacitación Catastro: Inicie capacitación a personal atención al pueblo. Para bu	Mapas Temáticos		Mapas Temáticos		
		Harbor Head				

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Harbor Head

Mapas Actualizados

Mapa del Departamento de Río San Juan
 Escala 1:250,000



Descargar en Alta Resolución

Mapa de la División Política Administrativa
 Escala 1:750,000 versión escolar



Descargar en Alta Resolución

Mapa Topográfico
 Escala 1:50,000



Descargar en Alta Resolución

Mapa Topográfico
 Escala 1:250,000



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- Imagen Meteorológica Reciente
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- Pronóstico Hidrológico
- Pronóstico de Mareas

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- Fallas Geológicas de Managua
- Amenazas por Deslizamientos
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Programa:

- 08:00 Inauguración por Dr. Alejandro Rodríguez, Director Ejecutivo
- 08:15 Programa Cultural
- 09:00-12:30 Ponencias Científicas, Auditorio de INETER Ver programa completo
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Índice de Mapas

- [Índice de Mapas Topográficos 1:50,000](#)
- [Visor de Mapas Topográficos 1:50,000](#)

Mapas de Nicaragua

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- [Mapa Físico-Geográfico](#)
- [Mapa del Relieve de Nicaragua](#)

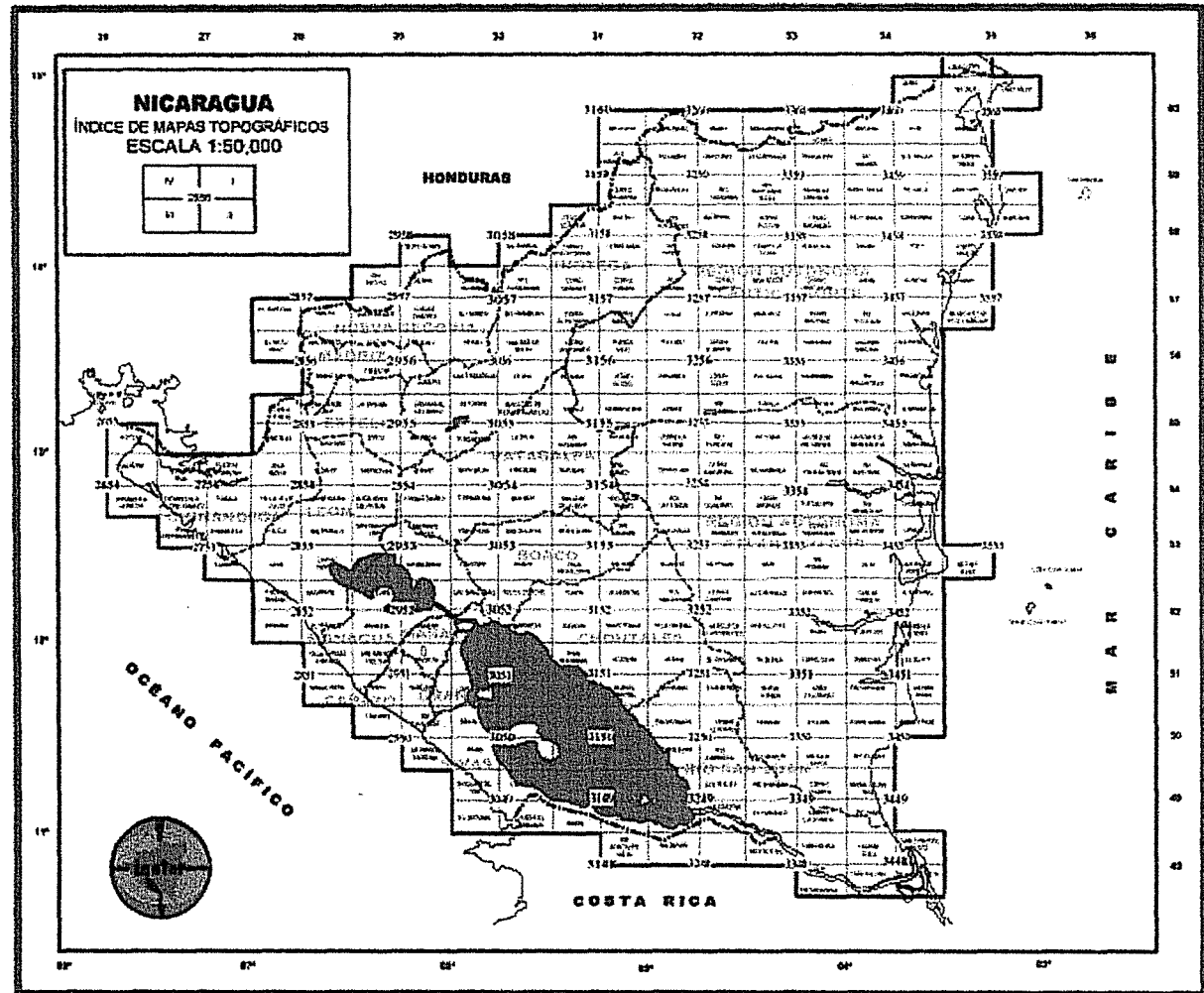
Mapas Departamentales

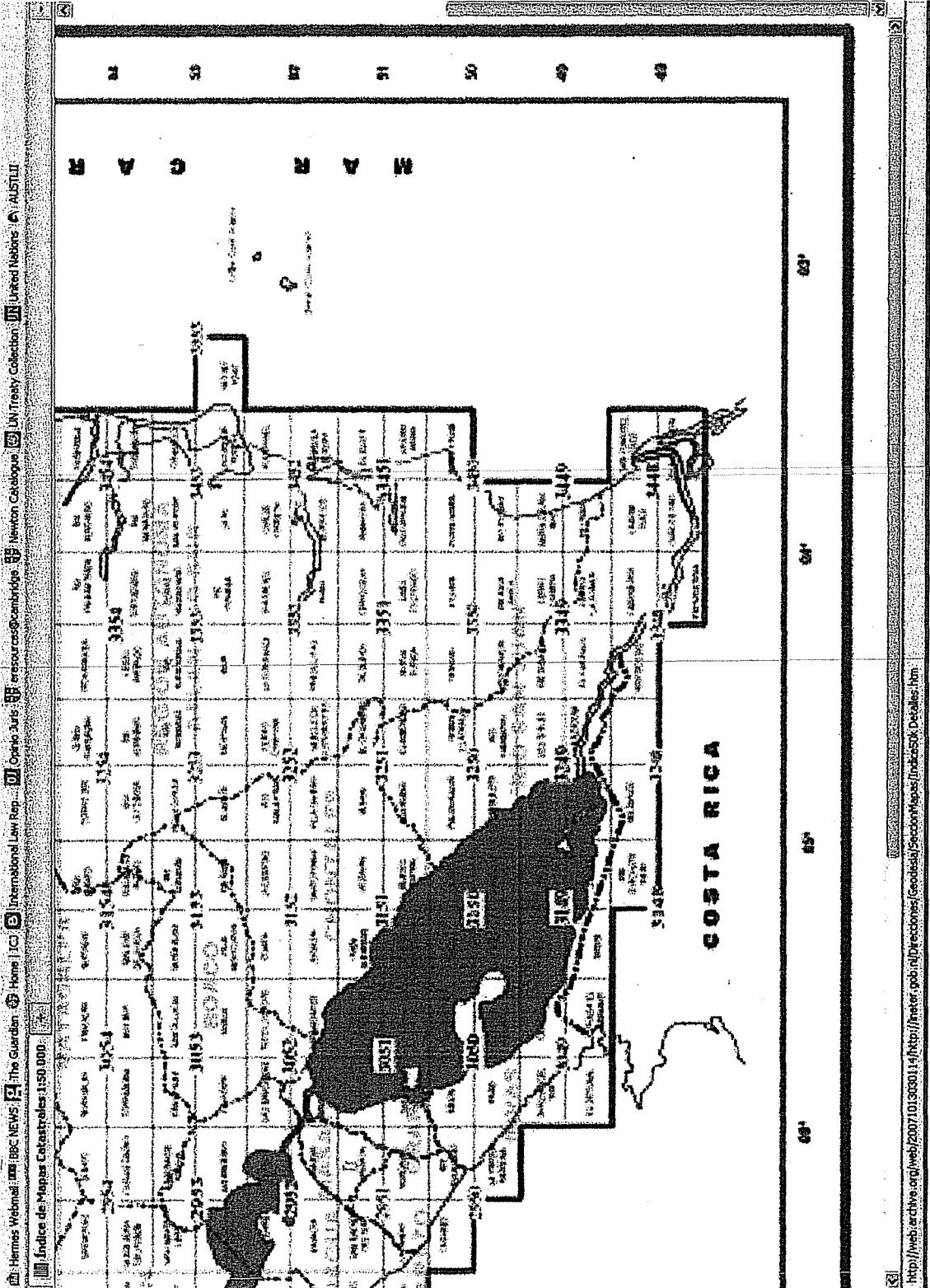
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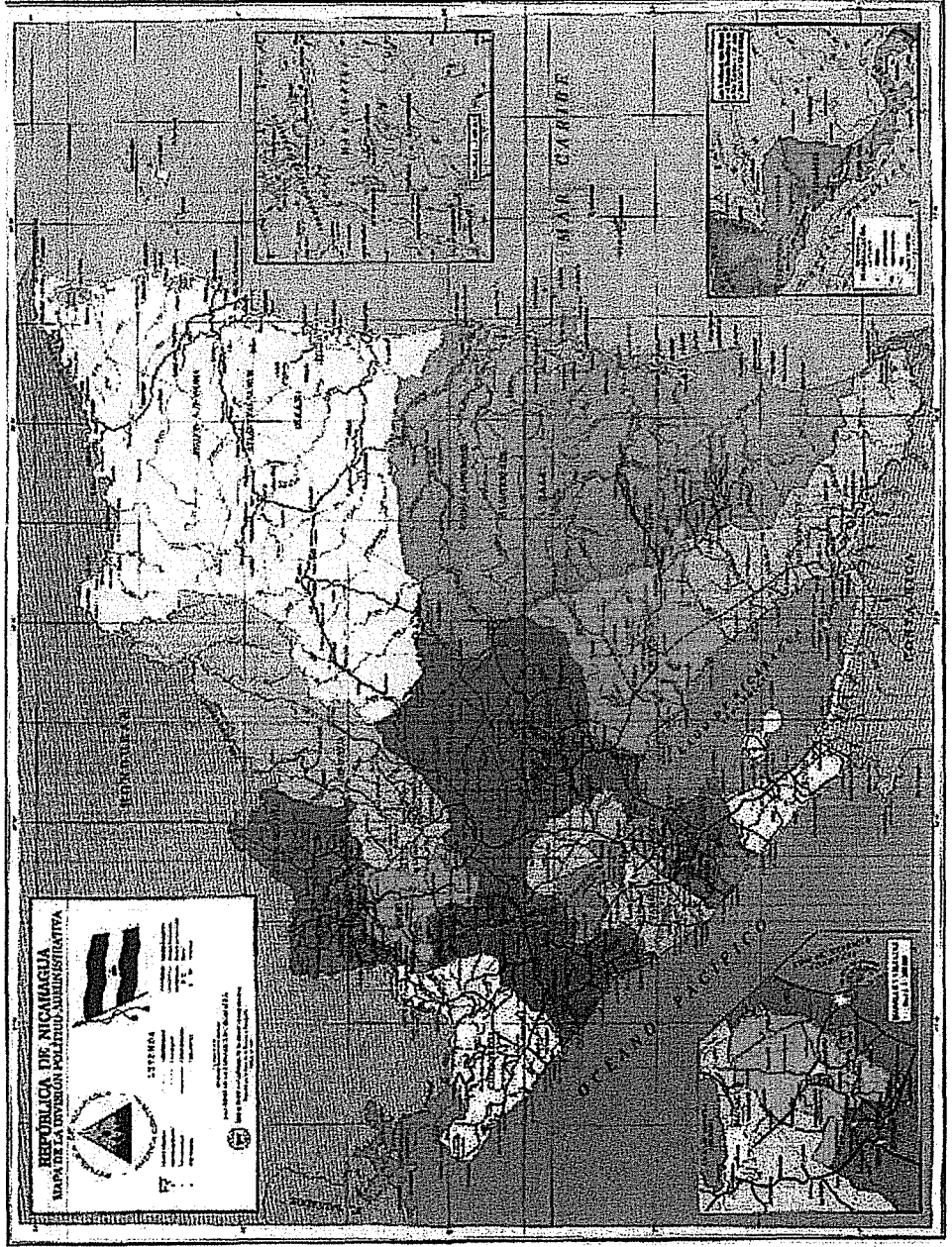
MAPAS

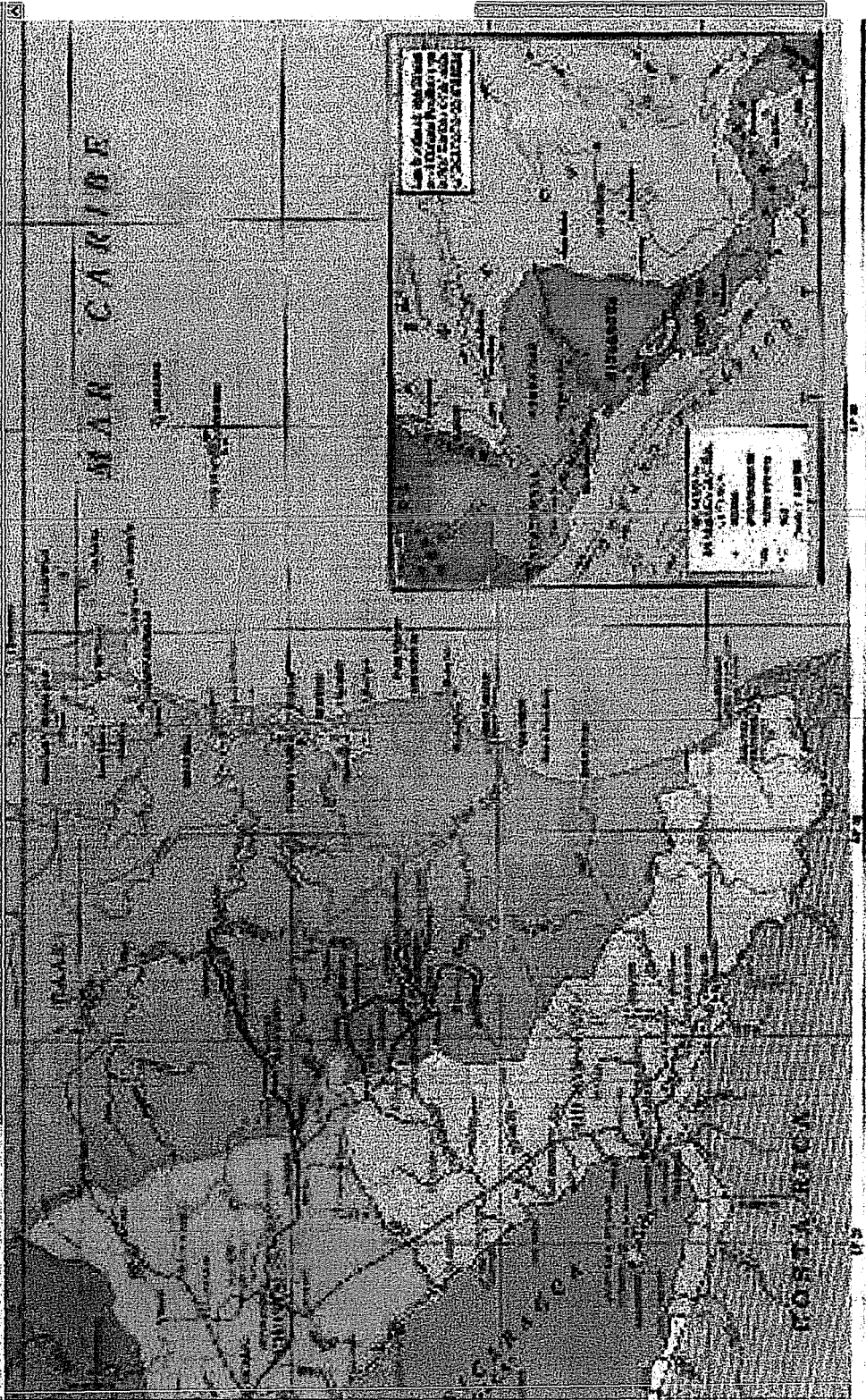
Nota: Muchos de los límites Departamentales y Municipales que aparecen en estos mapas topográficos a escala 1:50,000 fueron modificados en el año 1995.

-**Índice de Mapas.**- Muestra en tamaño carta, un índice de mapas topográficos, que puede ser guardado en su disco duro o impreso, usando las herramientas que brinda el explorador de internet :

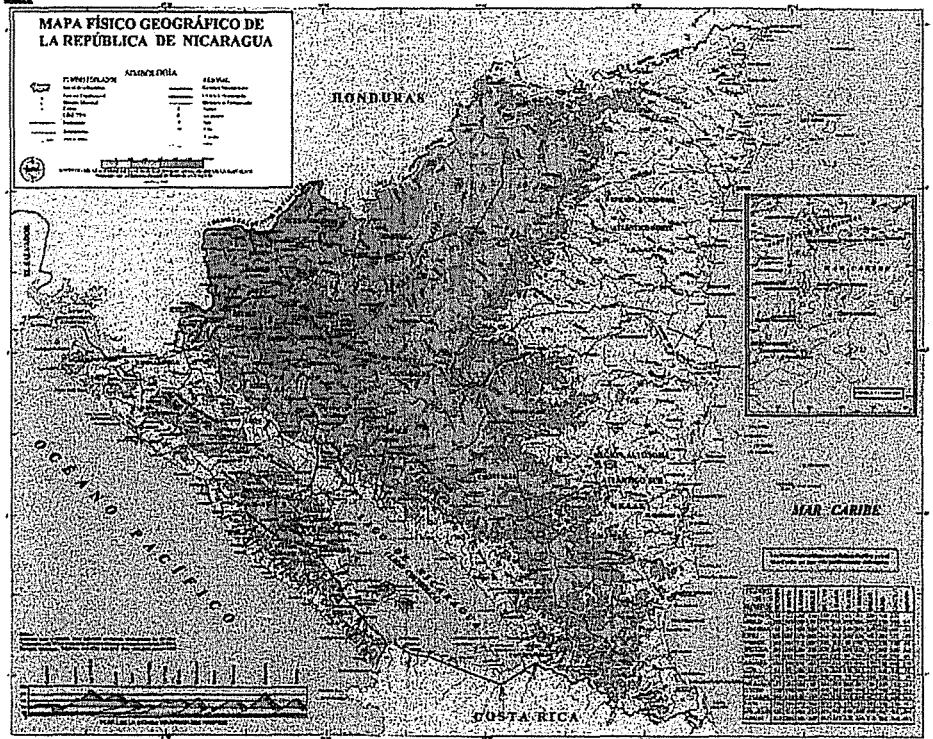


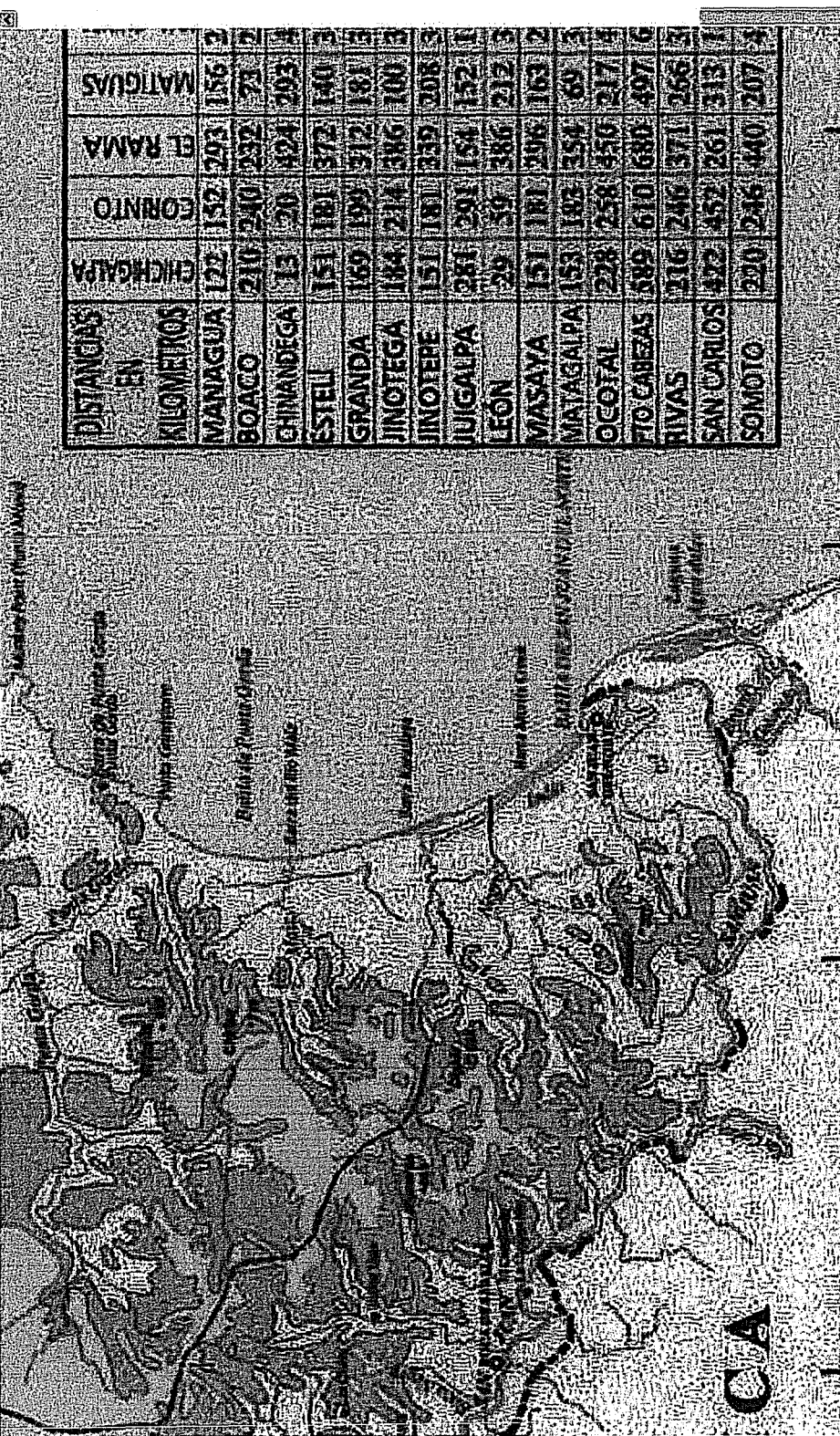






Mapa Físico de Nicaragua - Mozilla Firefox
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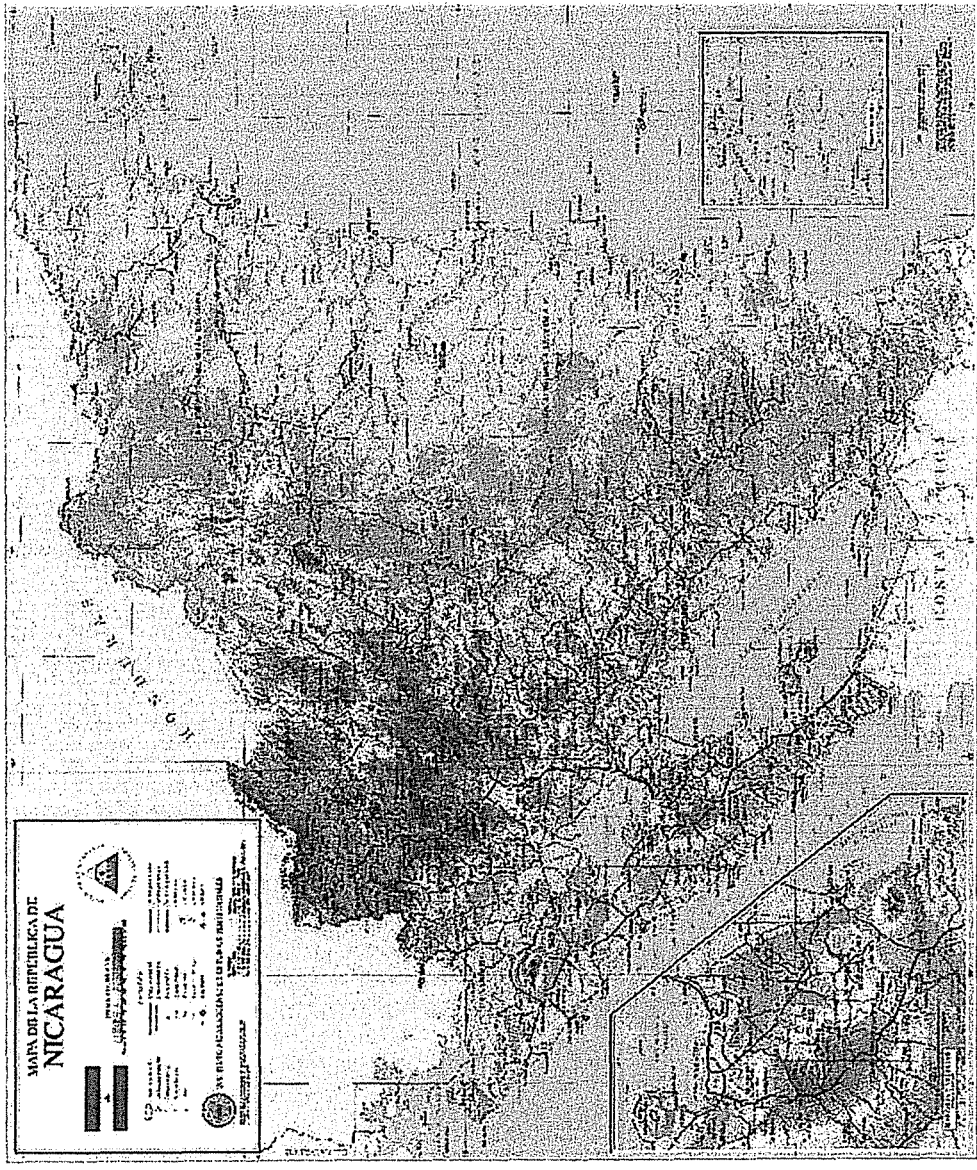
Mapa Nicaragua (Baja) - Mozilla Firefox

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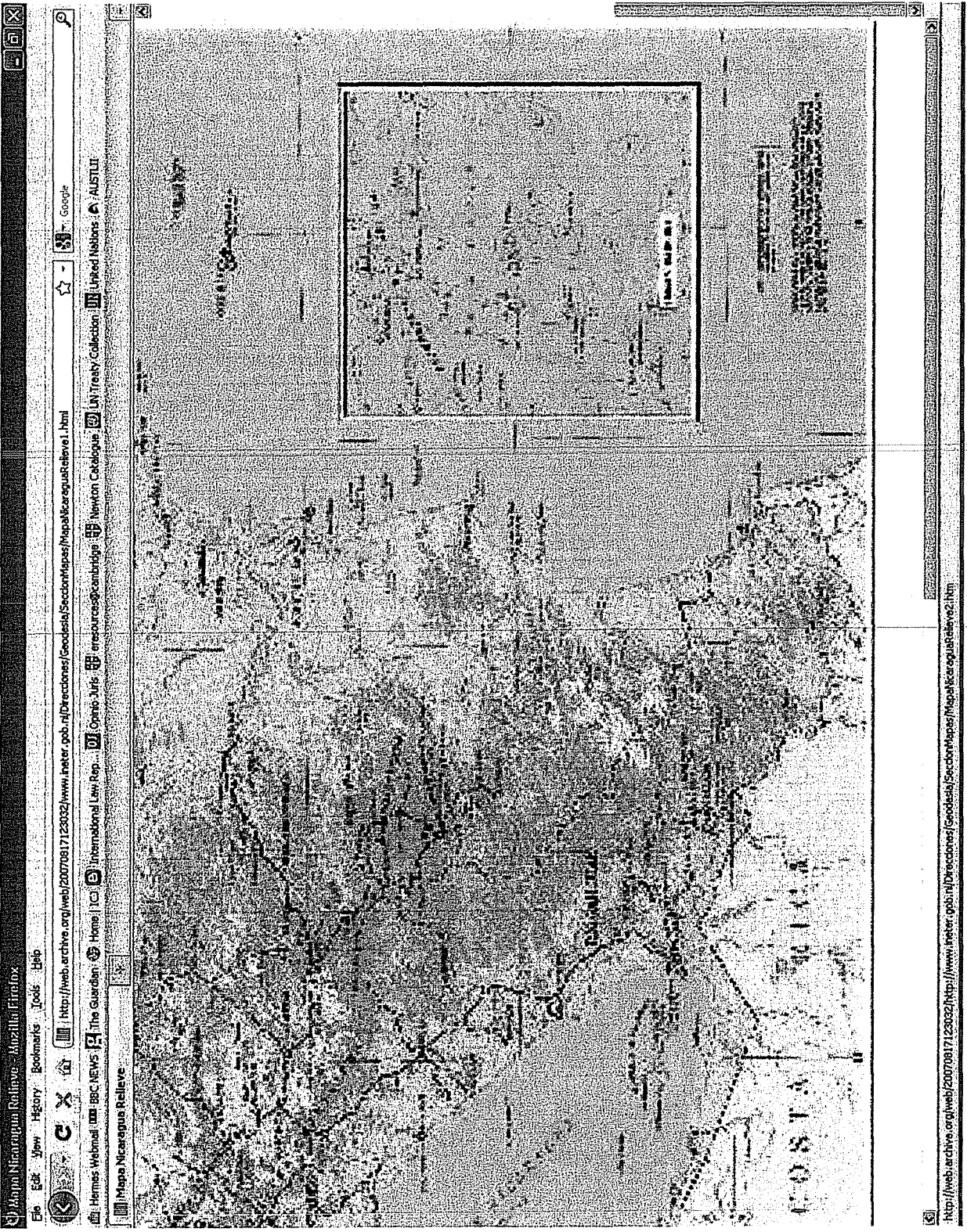
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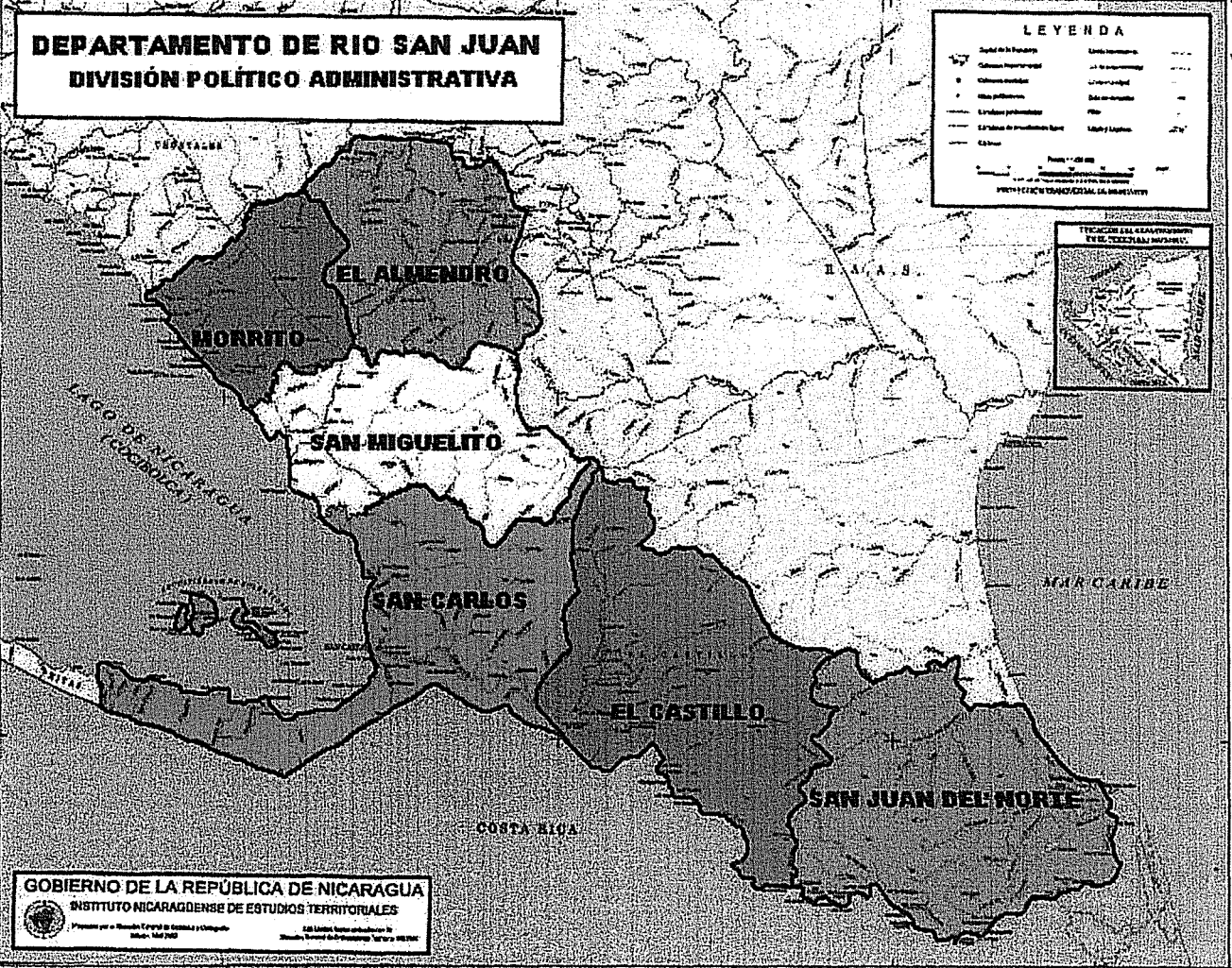
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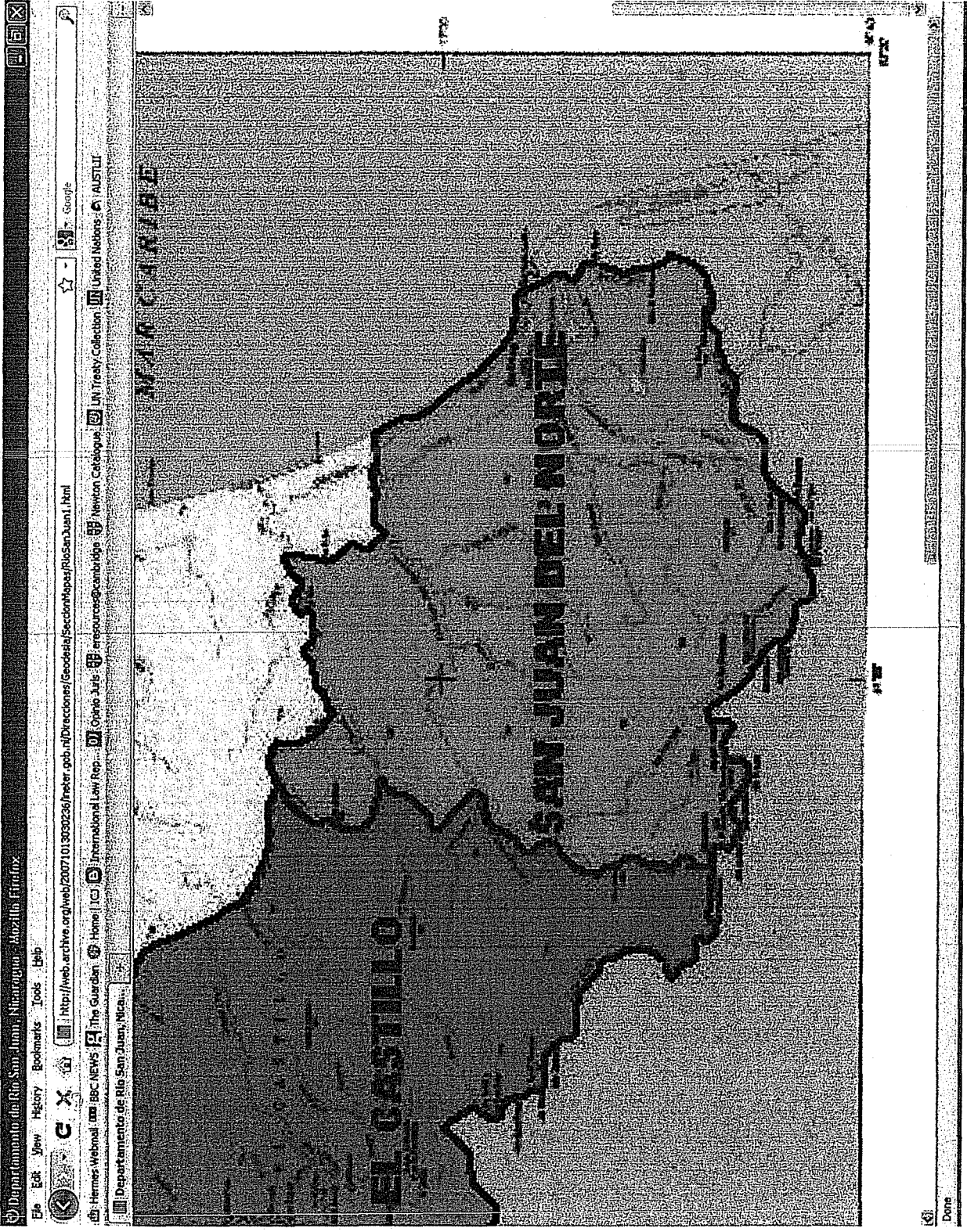
Mapa Nicaragua Relieve



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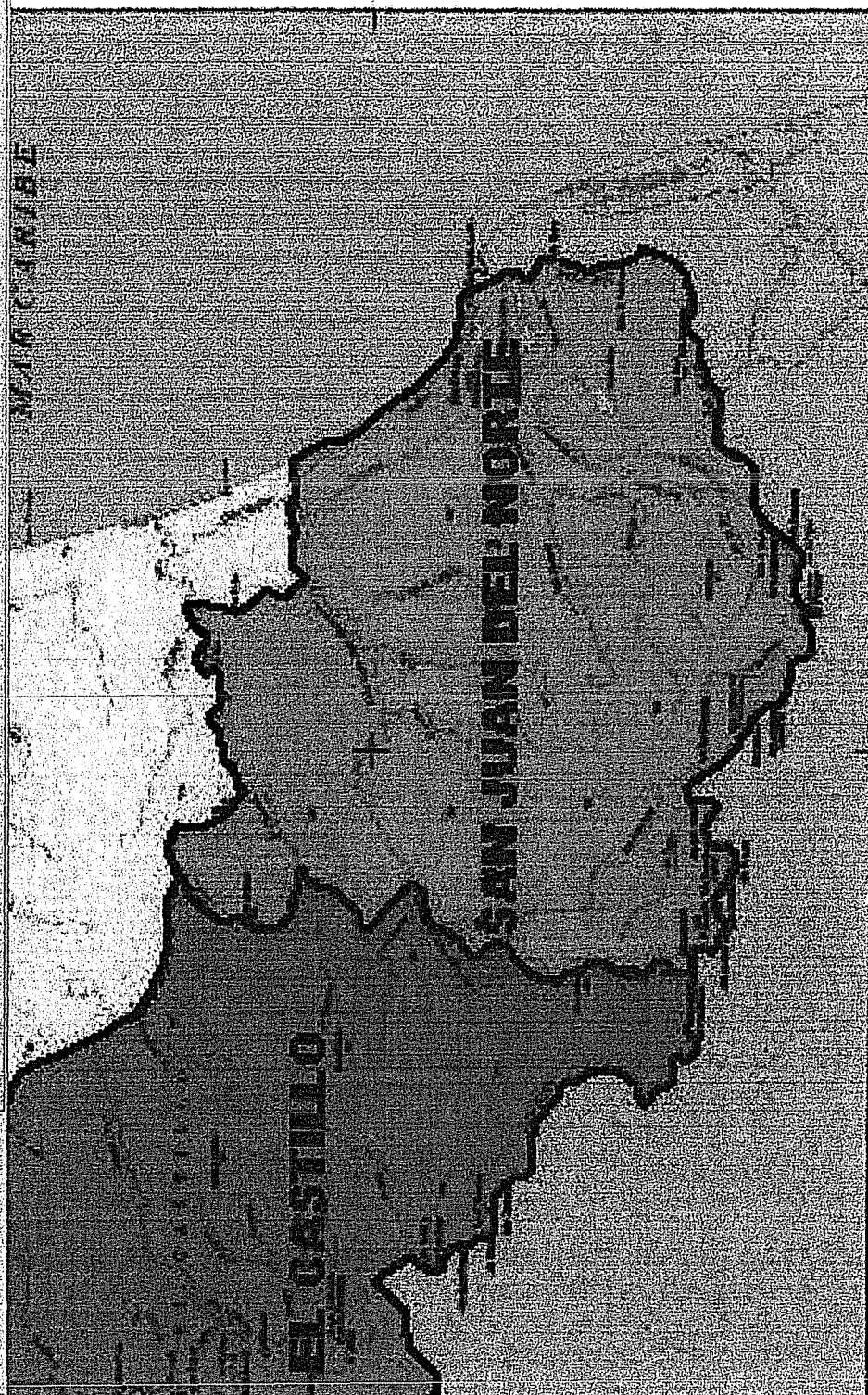


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XXVI INETER Anniversary

Current Information

- Recent Selsmiclty
- Web Cam - Volcanoes
- Rainy Season (2007)
- Recent Weather Picture
- Weather Forecast
- Hydrological Forecast
- Tide Forecast

Basic Information

- Geographic Characterization
- Geological Faults Managua
- Landslide Hazards
- Natural Hazards
- SIG-INETER
- Map

Tasks and Products

- About INETER
- Public Services
- Product Catalog
- Metadata
- Projects 2007
- 2007 Press Releases
- Report 2002-2006

In October 1981 he founded INETER Geoscience Institute of Nicaragua.

On Friday, October 5, 2007, INETER hold its XXVI anniversary. Is presented through visual media, the relevant aspects of domain-specific technologies in the technical areas of seismometers, cartographic production demonstrations in digital photogrammetric workstation, operation of Cadastral Information Systems, CIS II and CUDOC; details on supply early warning information on volcanic processes, tsunamis, earthquakes, landslides, WAN digital communication network, procurement of NOAA satellite images in real time, and constant monitoring and real-time hydrometeorological data (rainfall and water levels in rivers)

Program:

- 8:00 Opening by Dr. Alejandro Rodríguez, Executive Director
- 8:15 Cultural Program
- Scientific Presentations 9:00 to 12:30, Auditorium INETER View full schedule
- 9:00 to 12:30 Exhibitions, INETER Information Center

Are invited to attend colleges, universities and the general public.



INETER Information Center

NOTE : You can see some news of seismometers here .

- Geodesy and Cartography
- Physical Cadastre
- Weather
- Water Resources
- Geophysics
- Land

- Earthquakes
- Volcanoes
- Landslides
- Storms and Hurricanes

- Canyon Somoto Photos
- Downloads
- Links

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MAP AND IMAGE PORTAL

- Topographic Maps
- Map of Hazard, Vulnerabilities and Risks
- Aerial Photos (Soon)

You are in [Geodesy and Cartography](#) > [Maps](#)

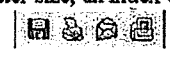
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- Index Map
- [1:50 Topographic Map Index, 000](#)
- [1:50 Topographic Map Viewer, 000](#)
- Map of Nicaragua
- [Political-Administrative Division](#)
- [Physical-Geographical Map](#)
- [Relief Map of Nicaragua](#)
- Departmental Maps
- [Boaco](#)
- [Carazo](#)
- [Chinandega](#)
- [Chontales](#)
- [Esteli](#)
- [Granada](#)
- [Jinotega](#)
- [Leon](#)
- [Madriz](#)
- [Managua](#)
- [Masaya](#)
- [Matagalpa](#)
- [Nueva Segovia](#)
- [San Juan River](#)
- [Rivas](#)

MAP

Note: Many of the departmental and municipal boundaries shown in these topographic maps at 1:50,000 scale were modified in 1995.

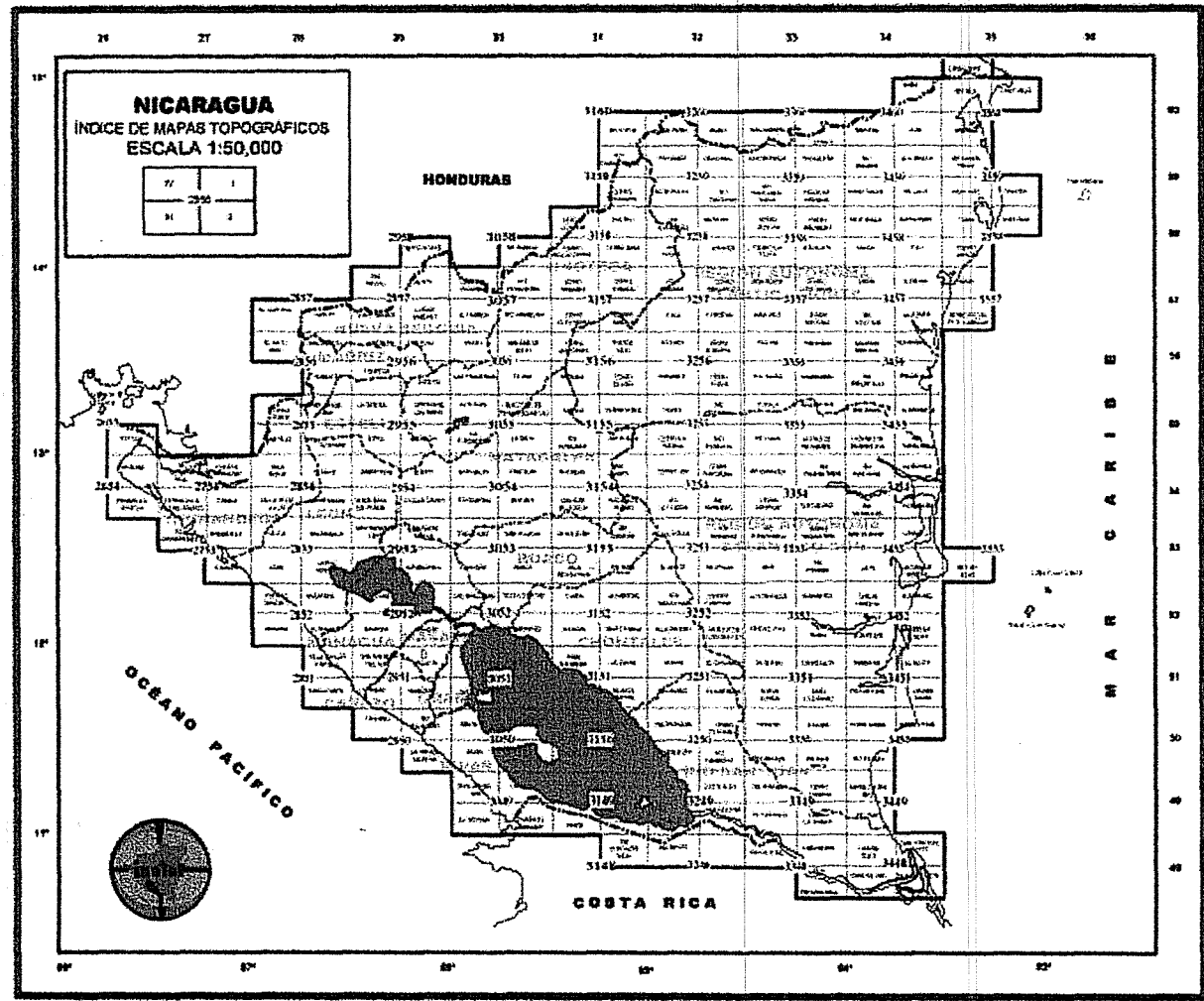
Map-Index - Sample letter size, an index of topographic maps, which can be stored on your hard disk or printed, using the tools provided by your Internet browser:



Once the map screen, you can click on it and view it in detail you can save on your hard drive, and then use a plotter to print.

- **Maps Departmental** - By clicking on the map image is bound to a larger image where you can appreciate better the details, this image can be printed directly and you need a plotter to do, but you can download to your hard disk. These images are not to scale in this section.

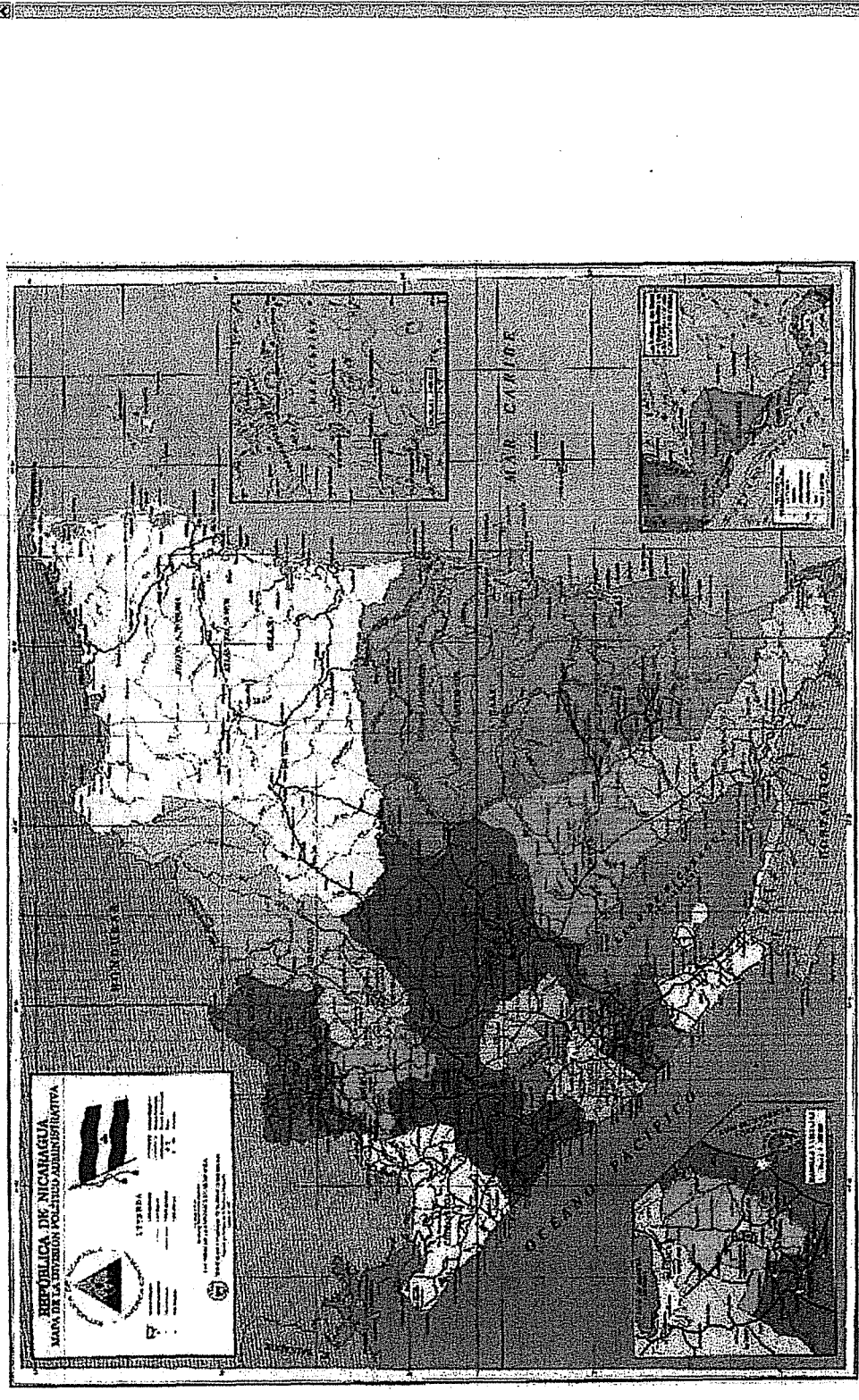


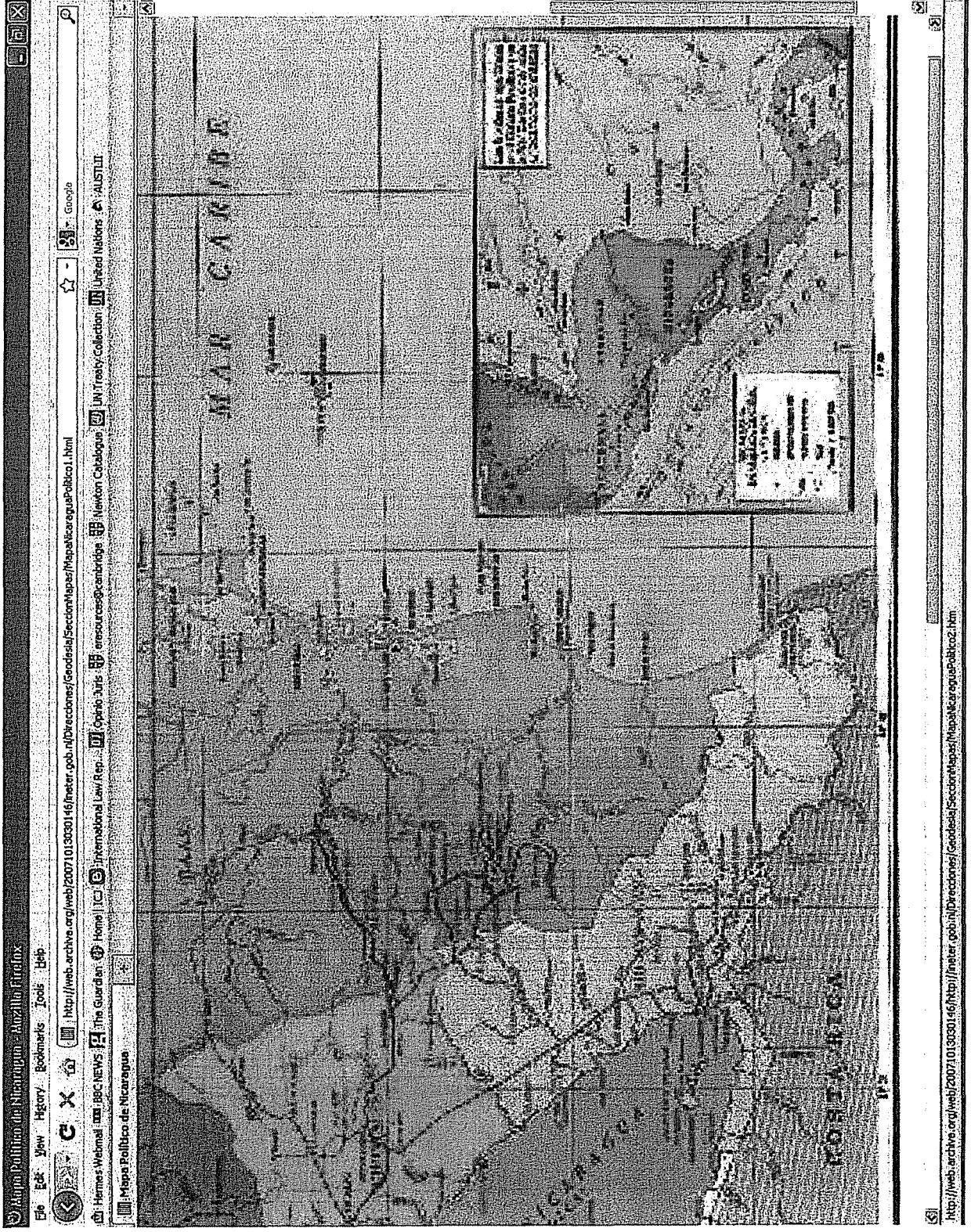


[Índice de Mapas Catastrales 1:50 000 - Mozilla Firefox](#)
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<http://web.archive.org/web/20071013030114/http://meter.gob.ni/Direcciones/Geodesia/SeccionMapas/Indice1.html>
 Índice de Mapas Catastrales 1:50 000

The map displays a cadastral grid over the territory of Costa Rica. Each parcel is labeled with a unique identification number, such as 3125, 3126, 3127, 3128, 3129, 3130, 3131, 3132, 3133, 3134, 3135, 3136, 3137, 3138, 3139, 3140, 3141, 3142, 3143, 3144, 3145, 3146, 3147, 3148, 3149, 3150, 3151, 3152, 3153, 3154, 3155, 3156, 3157, 3158, 3159, 3160, 3161, 3162, 3163, 3164, 3165, 3166, 3167, 3168, 3169, 3170, 3171, 3172, 3173, 3174, 3175, 3176, 3177, 3178, 3179, 3180, 3181, 3182, 3183, 3184, 3185, 3186, 3187, 3188, 3189, 3190, 3191, 3192, 3193, 3194, 3195, 3196, 3197, 3198, 3199, 3200. The map also shows major roads, rivers, and the coastline. The text "COSTA RICA" is printed vertically on the right side of the map.

<http://web.archive.org/web/20071013030114/http://meter.gob.ni/Direcciones/Geodesia/SeccionMapas/Indice1.htm>





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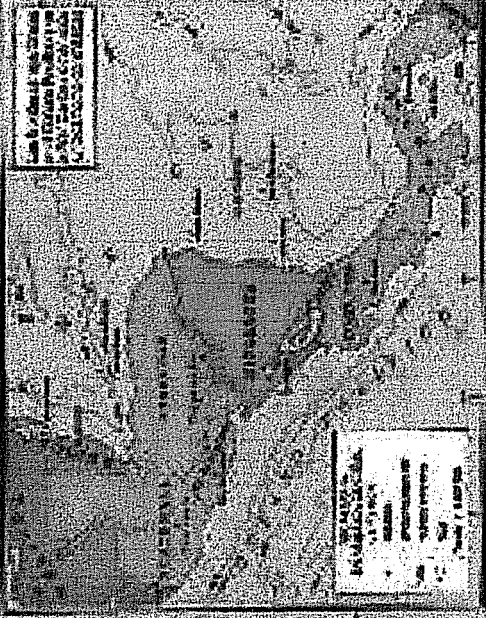
Opinio Juris

International Law Rep.

The Guardian

BBC NEWS

Mapa Político de Nicaragua



http://web.archive.org/web/20071013030146/http://www.archivo.org/web/20071013030146/mater.gob.ni/ direcciones/Geodesia/SeccionMapas/MapaNicaraguaPolitico2.html

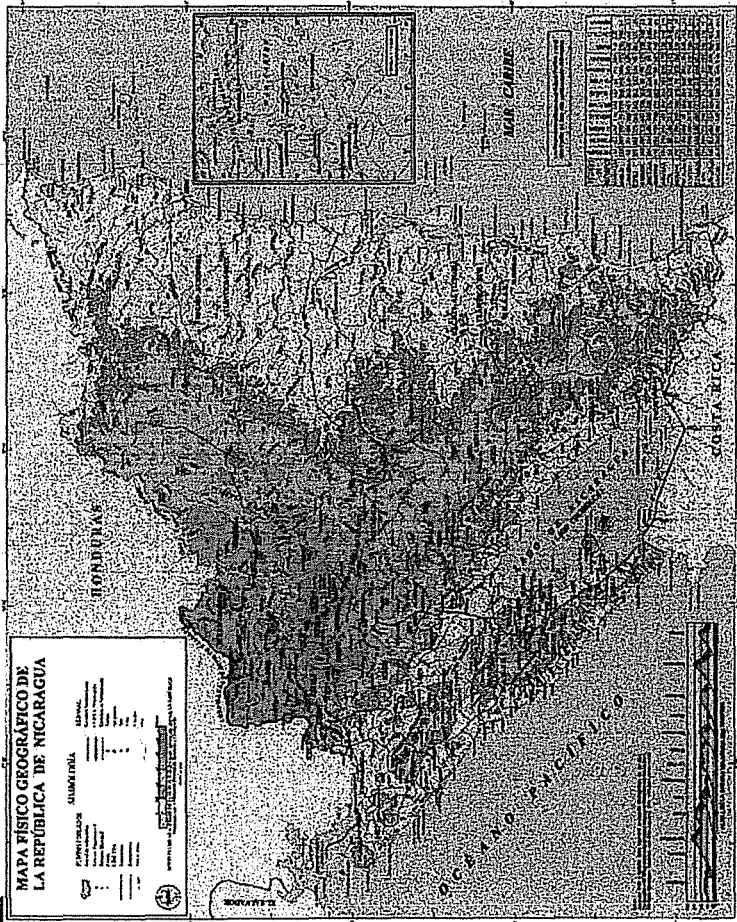
Mapa Físico de Nicaragua - Mozilla Firefox

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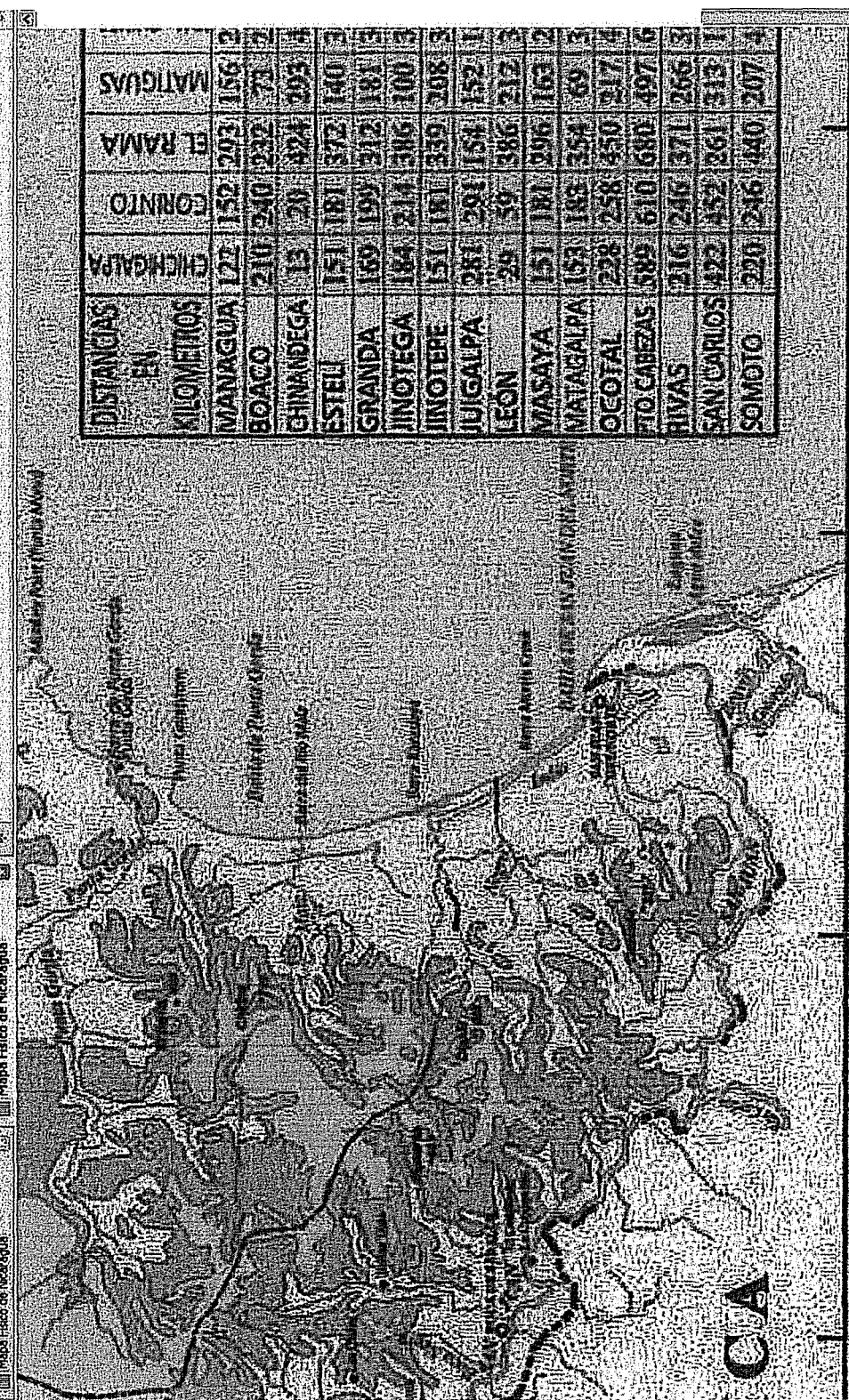
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Mapa Físico de Nicaragua



Done



DISTANCIAS EN KILOMETROS	MANAGUA	BOACO	GHUANDEGA	ESTELI	GRANADA	JINOTEGA	JINOTERE	JUJUGALPA	LEON	MASAYA	MATAGALPA	OCOTAL	PTO. CABEZAS	RIVAS	SAN CARLOS	SOMOTO
MATAGALPA	122	210	13	151	169	184	151	281	29	151	153	228	589	216	422	220
EL RANMO	293	292	20	181	199	214	181	291	59	181	296	258	610	240	452	246
MATIGUAS	156	73	993	140	181	100	208	152	312	163	69	217	497	266	313	207

83° 00'

84° 00'

