August 19, 2014 Mr. Jean Pierre Oriol Acting Commissioner Virgin Islands Department of Planning and Natural Resources Coastal Zone Management Program

Dear Mr. Oriol,

The purpose of this letter is to voice my opposition the proposed Summers End Group (SEG) marina project for Coral Bay. My primary reason for opposition is that, like many others, I believe the proposed SEG marina is too large, our infrastructure is too weak and the project would cause a significant negative environmental impact. Others have spoken eloquently on these subjects. Furthermore, from a social perspective, this project would superimpose an artificial, sanitized and essentially boring development over a town that has grown organically for several hundred years into the authentic and natural community that so many of us have grown to love.

Kathy and I have not lived here for a long time. We sailed into the harbor in 1999 and fell in love with Coral Bay. Later we bought a lot on the hill, and we sailed back in 2006 to make Coral Bay our home. While we were building our house, we lived on our boat in the harbor. We had a registered mooring and a coast guard compliant waste system. We sold our boat two years ago, so we no longer have a personal stake in the outcome of this decision. But we do share a common bond with most of the people who came here before us. We all sailed into Coral Bay after a considerable sea voyage. We all know which way the wind blows, and we all know where the seas are coming from. And we all know that the proposed marina location is bad: not just because of the potential for a major hurricane, but because of the prevailing wind and seas.

Ask yourself this question, "If the proposed marina location is good, then why has there never been a dock at this location during the 300 years that Coral Bay has been inhabited?" Are we to assume that the colonial residents of Carolina and Little plantations enjoyed manually carting their imports and exports to the town dock all the way around the harbor? I'm pretty sure that those that came before us were smart people. And, I'm pretty sure that they knew which way the wind blows and where the seas are coming from.

So, let me present some facts about winds and seas:

In Coral Harbor, the prevailing wind and waves come from the Northeast to Southeast. The percentages break down as follows:

Wind Dir	Percentage	Wind Speed	Seas
Northeast	22%	11-17	1-4 feet
East	55%	11-17	1-4 feet
Southeast	14%	11-17	1-4
Other Dir.	10%	7-10	less than 1

This information comes from the 2002 World Pilot Charts, which are based on ship reports compiled by the US Government for over 100 years. These ship reports do not include data from hurricane or tropical storm conditions, only the prevailing winds. In Coral Harbor, we are mostly concerned with waves from the Southeast. So, why is this important? The proposed marina has most of its slips oriented East-West. For several days of every month (over 50 days per year) boats in these slips will be subjected to beam seas of 1-3 feet. Boats on the south sides of finger piers will have their topsides ground against their fenders which will be pressed against the finger piers. In the Virgin Islands, waves typically come on seven second intervals. So, when the weather is from the Southeast, each yacht will be subjected to about 12 thousand waves per day at the marina.

This is not such a problem for boats on moorings, since they will align themselves bow to the waves, which is a much easier motion. And, since they are not tied to the dock, they can move easily with the seas.

I have docked 40-60 foot sail and power boats hundreds of times in our local waters, I have a 100 Ton masters license, and I am familiar with most of the marinas in the USVI and the BVI. In my opinion, a yacht owner could not leave his vessel unattended in the proposed SEG marina. There is too much chance that his topsides would be scuffed. All that it would take is for a single fender to slip.

Until last year, I was the private captain of a 56 foot motor yacht. It is one of the largest, nicest and most expensive motor yachts available for day charter on St John. Given the conditions that will surely prevail several days in each month, the proposed SEG marina could only be considered a short-term stop. We could drop-off or pick-up guests, and maybe stop for lunch. Then, we would be off to a quiet anchorage or a secure overnight marina. I know that the owner and his guests do not like a rolling night at anchor, and I'm sure that he would not want to pay for the privilege rolling at the SEG marina for a sleepless night. While most days will not be too bad, it only takes one bad experience, and people will not return. Since the press release about the proposed SEG marina project, I have been wondering why the developers of this project have overlooked the problems for yachts that will be caused by waves entering the harbor from the Southeast. As mentioned above, this happens frequently enough that the proposed marina could

not be considered desirable for high end yachts. It seems that the developers of this project are primarily real estate developers. I'm wondering if they really know which way the wind blows and where the seas are coming from.

Mr. Oriol, I am sure that you want what is best for our community in the long term. I hope you will also consider what is best for the investors in this proposed project. It would be a shame for some unsuspecting investor, with island dreams, to find out that his \$20 thousand marina investment is lost.

Respectfully submitted,

Stan Nicholas Coral Bay

Month	Southeast	East	Northeast	Other
Jan	16	49	33	2
Feb	10	48	30	12
Mar	12	49	28	11
Apr	20	52	22	6
May	18	60	12	10
Jun	16	67	10	7
Jul	10	70	16	4
Aug	10	63	18	9
Sep	16	54	14	16
0ct	18	53	14	15
Nov	12	44	26	18
Dec	8	47	35	10

Coral Bay Wind Direction -- Percent of Time

Source: 2002 World Pilot Charts - National Geospatial Intelligence Agency