



CORAL BAY COMMUNITY COUNCIL

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May 3, 2018

Mr. José A. Cedeño Maldonado (delivered via email)

Jacksonville District, Army Corps of Engineers Antilles Office
Fund. Angel Ramos Annex Bldg., Suite 202, 383 F.D. Roosevelt Ave.
San Juan, Puerto Rico 00918

cc: Donnie Kinard, Tori White, Alisa Zarbo, Sindulfo Castillo, Noel Acevedo (delivered via email)

Re: SAJ-2004-12518 (SP-JCM) St. John Marina

Dear Mr. Cedeño,

On behalf of our residents, we would like to thank the Army Corps for its efforts assisting with disaster recovery following the catastrophic storms of 2017. We are acutely aware of the struggles in Puerto Rico and hope things are slowly improving for you, as they are slowly improving here.

Given all of our post-hurricane priorities, and given the lengthy delays of the FOIA process, we have just now completed our review of the documents sent to the Corps by the Summer's End Group (SEG) during August 2017, and their follow-up submissions of December 2017 and February/March 2018. David Silverman obtained these documents via the Freedom of Information Act and has been instrumental in reviewing them and assembling our comments.

The ACOE's excellent and detailed responses to the applicants' submissions appear on target in identifying many of the key and continuing deficiencies in the Summer's End Group application and project design. A finding that the project is not in the public interest would be consistent with the record, as established. All of our previous comments remain relevant today, after the hurricanes.

As you know, the Coral Bay Community Council (CBCC) is the recognized watershed management agency for Coral Bay and has worked extensively with EPA and NOAA to implement stormwater best management practices (BMPs) to improve the water quality of Coral Bay. Post hurricanes, CBCC is also playing a significant role in the recovery process with FEMA, other federal and VI government agencies, and local partners. We expect to manage a number of recovery projects, and we are contributing to the whole VI watershed stormwater management resiliency and recovery efforts now, post hurricanes, with our staff.

In the hope that it will prove useful to you in completing your analysis, CBCC is submitting the attached report with comments on significant new aspects of the SEG recent submissions. This includes the new alternatives analysis, the compensatory mitigation plan, the sea grass impacts analysis, the new marina design, piling

installation, and the wind and wave analysis, and other components, including their video commentary, their extensively revised economic analysis and their responses to federal agency comments.

In some cases, the impacts of the hurricanes have created new concerns, particularly around the capacity for natural recovery, and we've addressed those concerns where appropriate.

Also, we were surprised to read in these recent rebuttal documents that the Summer's End Group proposes to take over ongoing maintenance of existing stormwater management BMPs for CBCC and the VI Government, without apparent comprehension of what is actually involved. It is important to say here that SEG, and its principals, have had NO communication with CBCC whatsoever during the past couple of years, and only very minimal presence in Coral Bay post hurricane.

Thank you for your time and attention in this evaluation. Please let us know if we can provide any additional information about Coral Bay today, as we recover.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SC', with a stylized flourish extending to the right.

Sharon Coldren

President