

# MANKO | GOLD | KATCHER | FOX LLP

AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

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Admitted in PA

May 4, 2018

Mr. José Cedeño-Maldonado  
U.S. Army Corps of Engineers  
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c/o Antilles Permits Section  
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PHILADELPHIA, PA  
\*CHERRY HILL, NJ  
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by appointment only

*\*Partner responsible - Bruce S. Katcher*

Re: Proposed Construction of St. John Marina Coral Bay, St. John,  
USVI SAJ-2004-12518 (SP-JCM)

Dear José Cedeño-Maldonado:

As you are aware, this firm represents the Coral Bay Community Council and certain residents of St. John, including David and Susan Silverman, with respect to the above-referenced project. We have submitted previously significant comments in opposition to the Project and have requested that the application for the project be denied. Many other federal agencies and tens of thousands of individuals also submitted comments in opposition to the Project.

Based on those comments and its own review of the application, the Corps submitted extensive comments to the applicant, Summers End Group, LLC ("SEG") on its application. Despite deadlines established by the Corp, SEG did not respond to comments for well over a year. Recently, SEG has provided its responses which we believe are incomplete and inaccurate and further demonstrate that the application should be denied.

To that end, we are enclosing additional comments on SEG's recent submissions further supporting denial of the application. We respectfully request that these comments be made part of the administrative record.

Respectfully,



Robert D. Fox  
For MANKO, GOLD, KATCHER & FOX, LLP

RDF/kl



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cc: Donnie Kinard, Acting Chief, Regulatory Division, Jacksonville District, USACE  
Tori White, Deputy Regulatory Division, Jacksonville District, USACE  
Alisa Zorbo, South Branch/Jacksonville District, USACE  
Sindolfo Castillo, Chief, Antilles Regulatory Section, USACE  
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