



United States Department of the Interior



NATIONAL PARK SERVICE
Virgin Islands National Park
Virgin Islands Coral Reef National Monument
1300 Cruz Bay Creek
St. John, VI 00830

ELECTRONIC COPY, NO HARD COPY TO FOLLOW

January 20, 2016

Mr. Sindulfo Castillo
Chief Antilles Regulatory Section
U.S. Army Corps of Engineers
Annex Building, Fundacion Angel Ramos
383 F.D. Roosevelt Avenue, Suite 202
San Juan, Puerto Rico 00918

Dear Mr. Castillo,

I am writing to provide the U.S Army Corps of Engineers my comments on a pending permit, # SAJ-1982-05019 (SP-JCM), for the Sirius Marina in Coral Harbor on St. John. I have read the permit request and was able to locate a copy of the applicants Environmental Assessment Report (EAR) on the Coral Bay Community Councils website. The applicant is requesting a permit to construct a 92 slip marina with associated land based facilities and amenities at the head of Coral Bay in Coral Harbor here on St. John. I would like to state for the record that I recognize the need for and support the concept of basic marine services in Coral Harbor; a fuel facility, sanitation/pump-out station and a regulated mooring field for starters. My concerns with this proposed development are not much different from my concerns as expressed in my comments on the St John Marina/Summer's End Marina (SAJ-2004-12518) permit application. These concerns are significantly heightened by the fact that it is possible that both projects could be permitted without either considering their collective and long term negative impacts to Virgin Islands National Park and Virgin Islands Coral Reef National Monument resources and visitor experience.

Given the proximity of the proposed marina to the Park and Monument I am again disappointed to see that neither the permit request nor the EAR makes any mention of the potential negative impacts to either Park or Monument. In fact the EAR does not even contain a section on Vessel Traffic impacts to any marine resource. As you are aware the Park's authorized boundary encompasses all of the Fortsberg area down to the water line including that part contiguous with Coral Harbor. This area of the boundary is directly opposite and within 1/8th mile of the proposed development. The Hurricane Hole area of the Monument is only 1.5 miles away via water and approximately 1 mile as the crow flies.

The Monument includes 20.3 square miles of submerged lands that adjoin Virgin Islands National Park while the Park contains some 8.7 square miles of waters along the South and North shores of the island. The Monument contains all the elements of a Caribbean tropical marine ecosystem. The biological communities of the monument live in a fragile, interdependent relationship and include habitats essential for sustaining and enhancing the tropical marine ecosystem, which includes mangroves, seagrass beds, coral reefs, octocoral hardbottom, sand communities, shallow mud and fine sediment habitat, deep algal plains, and other hard bottom habitats. The fish habitats, deeper coral reefs, octocoral hardbottom, and other hard bottom habitats of the monument are all objects of scientific interest and essential to the long-term sustenance of the tropical marine ecosystem.

The clear waters of the Monument support a diverse and complex system of coral reefs. The health of these coral reefs is closely tied to plants and animals inhabiting the reef as well as adjacent non-coral marine environments such as sandy bottoms, seagrass beds, and mangrove forests. The submerged monument lands contain representative examples of the entire range of tropical marine ecosystems including shallow water mangrove nursery habitats, deep water spawning habitats that are essential to the overall function and productivity of regional fisheries, and habitat for great whales which forage, breed, nest, rest, or calve in the waters.

The monument contains biological objects, including several threatened and endangered species, which forage, breed, nest, rest, or calve in the waters. Humpback whales, pilot whales, four species of dolphins, brown pelicans, roseate terns, least terns, hawksbill sea turtles, leatherback sea turtles, and green sea turtles all use portions of the monument. Countless species of reef fishes, invertebrates, and plants and algae utilize these submerged lands during their lives, and over 25 species of seabirds feed in the waters. Between the near shore nursery habitats and the shelf edge spawning sites, habitats in the monument play essential roles during specific developmental stages of reef associated species, including spawning migrations of many reef fish species and crustaceans.

Virgin Islands Coral Reef National Monument was established on January 17, 2001, by Presidential Proclamation 7399 to provide greater protection to sensitive coral reef resources located within federally owned submerged lands beyond Virgin Islands National Park. The proclamation prohibits all boat anchoring in the Monument, except for emergency or authorized administrative purposes. The proclamation also prohibits all extractive uses, except for bait fishing at Hurricane Hole and for blue runner (hardnose) line fishing in the area south of St. John, both by permit only. Permits for bait fishing and hardnose fishing are allowed "to the extent that such fishing is consistent with the protection of the objects identified in this proclamation." In addition to these restrictions and others, personal watercraft are prohibited from operating in the park and the monument under federal regulations.

My area of greatest immediate concern, due to its geographic proximity to this proposed marina development is Hurricane Hole. The submerged monument lands within Hurricane Hole support the most extensive pristine and well developed mangrove habitat on St. John. The monument provides spawning stocks and critical developmental habitats that allow for the restoration of depleted fishery resources and enhancement of adjacent fishing grounds. The area offers outstanding opportunities for education and scientific research due to the diversity, complexity

and relationship of the natural resources and provides a dynamic laboratory for study and learning.

Aside from the Hurricane Hole area, the majority of the Monument and some of the most pristine beach and marine habitat in Virgin Islands National Park lie due south of Coral Harbor on the South side of St. John with immediate access from this development. In addition to the Park and Monument, Lagoon Point, a National Natural Landmark is located in Coral Bay directly along the transit routes to and from the proposed marina.

The only mention I find of Virgin Islands National Park and Virgin Islands Coral Reef National Monument is in the permit announcement under "existing conditions" where the Corps clearly identifies the proximity of both to the proposed development. I have read the Environmental Assessment Report prepared for the Sirius Marina proposal for T-Rex St John by William McComb, P.E. and note that there is no mention whatsoever of potential impacts to the natural or cultural resources of either the Park or Monument in this document. There apparently is no consideration given by the applicant to the potential negative cumulative impacts to Park and Monument resources caused by the increased vessel traffic associated with the marina. The impacts of this increased traffic on water quality, marine resources, wetlands (mangrove areas), coral reefs, sea grasses, fish and marine invertebrates and species of concern protected by the Endangered Species Act do not appear to be considered. There is no indication of consideration of impacts to Park and Monument soundscapes, lightscapes or cultural and archaeological resources; not to mention visitor use and experience.

I would ask that your office not issue a permit until the impacts on these critical resources are adequately considered; with mitigation for negative impacts identified and required as a condition of this permit. As mentioned earlier and as recognized by T-Rex in their EAR, the possibility of two large marinas being built and operated in the small harbor in close proximity to the Park and Monument is very real. Neither proposal seriously considers their potential cumulative impact on Park and Monument resources, either during construction or over the long life expectancy of their operation. I believe that this development can reasonably be expected to cause significant long term harm and impairment to the resources of Virgin Islands National Park and Virgin Islands Coral Reef National Monument as to require the permitting agency (ACoE) and/or the permittee to complete a full Environmental Impact Statement before issuing a permit or proceeding. For this reason and due to the high level of public interest in these proposals I would request that the Army Corps of Engineers hold a public hearing on this proposed permit to include discussions on the possibility of both projects being permitted.

Thank you for your consideration on this matter.

Sincerely,



Brion FitzGerald
Superintendent