

August 18, 2014

Attention: Mr. Jean Pierre Oriol, Acting Commissioner
Virgin Islands Department of Planning and Natural Resources

Coastal Zone Management Program

Dear Mr. Jean Pierre Oriol:

The story of Summer's End Marina is the story of America during the last half century. The residents of Coral Bay may believe that the proposed changes faced by their community are unique. However, Coral Bay is not alone.

The transformation of a sleepy idyllic town into a dense residential and commercial center is a challenge faced by thousands of communities across our country. Homogeneous housing developments, strip malls, and super stores have swept across our land to recreate it in a new image. Coral Bay might become just one more small town fallen to this tragic American reimagining.

Do I want to be the one to reminisce with my grandchildren about how peaceful and beautiful Coral Bay once was - a precious treasure that I, through my greed or apathy, destroyed?

Do you want to be the one to blame?

A Call for Analysis

I agree that the services of a small and well planned marina would add value in Coral Bay. However, the proposed one hundred and forty slip Summer's End Marina I believe is ill conceived and far too large for the location.

Once this Pandora's Box is open, other developers with other names will be lining up to share in the spoils. It's a numbers game. Unless we formally limit growth, the developers will win and the community will lose.

I am not an environmental scientist, a marine architect or civil engineer so I can only speak from opinion. My opinions are expressed in this letter. For the facts, I propose, even demand that independent and unbiased impact studies be conducted by experts in a number of areas before approving any plans. I suggest the follow investigations:

Hurricane Computer Modeling

In regard to the location of proposed marina, a call for common sense can be heard at any gathering in Coral Bay where boaters are present. Boaters know that it is not a question of whether a hurricane will hit, it is when. With certainty, devastating hurricanes will sweep Coral Bay Harbor.

Any conscientious boater moored in the harbor knows that when a big storm threatens, their boat must be moved to a safe storm refuge. The Coral Bay anchorage where the marina is to be located is an extremely exposed and dangerous area of water during a storm.

Hurricane Hole has long been regarded as a safe place to weather a storm but it has limited space and according to permit registration, it is already full. It certainly cannot accommodate an influx of an additional one hundred and forty boats.

Can boats survive a large storm in the slips of the proposed marina? Can the marina structure itself survive a strong hurricane without devastating damage?

We need a study to find out what the effect of hurricanes ranging from force 1 through 5 will have on the structure with and without boats in the slips.

Environmental Comparison

According to the press and the report, one hundred and eleven boats are currently kept in Coral Bay Harbor. I am hard pressed to count anywhere near that many boats unless I count dinghies and skiffs. Regardless, the vast majority of the registered boats are kept on proper moorings.

The moratorium on mooring permits that has been in place for nearly four years has forced some registered boat owners to anchor their boats. Anchor chains do damage the seagrass. However, simply granting mooring permits and requiring that permit holders install proper ground tackle would easily solve this problem.

The developers would also like to lead us to believe that the majority of these one hundred and eleven boats house liveaboards. In reality, only about a dozen boats are occupied for residential use. Any waste issues caused by this tiny demographic in comparison to the environmental impact sustained by a large marina construction project and the supporting infrastructure must be examined further by an outside agency.

Without a study, I cannot prove that Summer's End will cause far more environmental damage than the existing population of the bay. However, from a layman's point of view this appears to be blatantly obvious.

Again, I suggest that the developers prove their claims with an independent, unbiased report.

Waste Management Analysis

The developers state that their customers will use holding tanks and pump-out their waste to be disposed of by barge. I think it is important to realize that Summer's End will be the only marina in the Caribbean to require pump-out in practice. Will boaters avoid

a marina that inconveniences them in this way? Will they sully their unused holding tanks if they even have holding tanks or will they simply go to another nearby marina? We would like to believe that potential marina clients will comply with the regulations out of the goodness of their hearts. But is this really the case?

Let us also suppose that the marina, once opened, does lose a substantial customer base due to the pump-out requirements. In this scenario, will Summer's End choose not to enforce policy? If unenforced, what will the effect on the bay be?

Further investigation of the waste disposal behavior of Summer's End's potential customers needs to be conducted. We also need to know what the impact of the waste from one hundred and forty occupied boats will be with pump out AND WITHOUT IT.

Supporting Infrastructure

The report maintains that water for the potential marina customers will be obtained by rain water catchment and delivery of water from the other providers. Conservatively, an occupied boat consumes approximately two hundred gallons of water per month. Multiply this number by 140 and the water needs of the marina can be estimated at about 30,000 gallons of water per month or around 350,000 per year.

Rain water cannot provide anywhere near this volume of water. Water delivery will be extremely expensive and will again drive potential customers to other marinas where the cost of water is reasonable.

It is safe to assume that the developers of Summer's End will apply for the permits for a desalinization plant soon after phase one of the construction is completed. We need to know the impact of the desalinization plant will be before any plans are approved and permits are granted.

Again, I am not a civil engineer so I must use common sense to guess at what supporting infrastructure will be needed to support the marina. I do know that much of what will potentially be needed is left out of the report.

I suggest that we hire qualified experts to explore the need for immigration and customs offices, traffic control, seawalls and jetties, and other infrastructure that I am not qualified to predict.

To my eye, it appears that the developers are playing a wait and see game. Omitting and ignoring the true impact of their plan. Hoping that once their initial structure is built, the authorities' hands will be forced to grant them anything they need to make the project profitable.

The Caribbean is freckled with abandoned marinas that failed due to poor or subversive planning. The derelict structures devastate the communities around them. The

developers of these marinas don't live with the risk of residing in the ghost towns that they create.

We do.

Sincerely,

Catherine Levy
A concerned Coral Bay resident
340-514-9307