Mr. Jean Pierre Oriol Acting Commissioner VI Department of Planning and Natural Resources Coastal Zone Management Program

Dear Acting Commissioner Oriol, August 18, 2014

Thank you for the opportunity to submit written testimony in response to Summer's End Group (SEG) proposal to build a marina in Coral Bay.

While additional facilities, such as a refuse pump-out station and a more structurally sound dingy dock, are needed, Coral Bay, both in terms of its environmental and cultural communities, is not an appropriate location for a marina of this size and scope. As a Virgin Islander, a Coral Bay resident, and an environmental scientist, I am confident that this marina would cause irreparable damage to the Bay's marine environment, as well as marine communities adjacent to the Bay. It would also disrupt traditional uses of the Bay, in addition to the charm of this sleepy "country" community, which currently already serves an attraction for tourists (without the proposed marina).

I support the Coral Bay Community Council's submitted written testimony outlining the inaccuracies and unsupported claims of SEG's plan submitted to CZM and the inappropriateness of this proposed project. Below is a list of some of Coral Bay's defining environmental features and the potential negative impacts that would occur as a result of the development of the proposed marina.

- The area of the proposed marina is home to native seagrass communities needed to stabilize marine sediment and help maintain water quality within the Bay. This habitat serves as a feeding ground to turtles and a benthic nursery for juvenile fish and is considered Essential Fish Habitat by NOAA. Construction of the marina and subsequent increased turbidity from the concentrated boat use in shallow waters would damage this seagrass.
- Marina construction would potentially impact the mangrove wetland habitat adjacent to the proposed site. Mangroves provide shoreline stabilization and protection from wave action. They are also home to birds and provide nursery habitat for juvenile fish.
- Coral Bay is an important breeding ground for sharks, which play an essential role as top predators in maintaining a balanced ecosystem.
- Coral Bay is also home to a number of species of corals. The planned boat density at the marina and the shallow draft will stir up sediments smothering corals and blocking light essential for coral growth.

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My concerns with the proposal are as follows:

• There has not been enough research of the Bay and community or planning to date. A Comprehensive Land and Water Use Plan and Area of Particular Concern plan for Coral Bay must be created before any major construction

plans are approved. We need a better understanding of the resources we have, in order to decide how we can best use them.

• The proposed marina is located in an open area of the Bay that is unprotected from wind and wave action, and therefore ill equipped to withstand major hurricanes.

Do the applicants have a hurricane plan? Where will boats go when there's a hurricane? All of the moorings in Hurricane Hole are reserved.

Will reserve funds be set aside to repair the marina if it is damaged (or will it just sit damaged and vacant)?

What kind of damage –both to the marine environment and nearby structures– will the marina cause if it torn apart in a hurricane?

- Coral Bay does not have the necessary infrastructure to support a marina of this size (i.e. access via one road only, water supply, etc.), and neither does Cruz Bay for that matter (i.e. vessel wastewater needing treatment).
- This large-scale private marina would impede public access to the Bay and disrupt traditional use of this resource (i.e. fishermen and recreational boaters access their vessels from the road here).
- How much submerged land will the marina take up? The proposed plan blocks the navigation channel used by most boaters currently. The marina would also take up anchorage area currently being used by Coral Bay liveaboard boaters. Where would these displaced boaters go? In light of these facts, I ask the Committee to consider a no action alternative for the SEG marina proposal. The location of the proposed marina and the scope and size of this project are not appropriate for this place. More appropriate for Coral Bay, and only after additional research and planning, I'd recommend a transient dock and boat services and perhaps a small marina on the opposite, more protected side of the Bay.

Thank you for the opportunity to voice my concerns.

Sincerely,

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