

APPENDIX 8
CBCC Alternatives Analysis



CORAL BAY COMMUNITY COUNCIL

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Alternatives Analysis

The following is a brief critique of the Summer's End Group assumptions and an outline of available alternatives that would fulfill their stated purpose, albeit on a smaller scale. The USACE's public presentation in Summer 2014 on its methodology for producing a matrix of alternatives and conducting a project's alternatives analysis was used as a baseline for assembling this pertinent information.

The background assumptions regarding the market and location of the Proposed Project are incorrect:

Note that the West End of the BVI – Sopers Hole -- is almost the same distance from Cruz Bay or Coral Bay harbor – as “the boat travels.” – due to the long East End peninsula of Coral Harbor. Once in Coral Bay – to get health, travel, or other services, one still needs to travel to Cruz Bay, or more likely St. Thomas. Cruz Bay is closer to most VI National Park destinations –like Trunk Bay on the North Shore and the fancy resorts of Caneel Bay and the Westin. Therefore, assumptions that the Proposed Project will be successful, draw traffic from the BVI and act as a gateway to St. John, are all contrary to existing facts and actual time and distance. Any marine facility in Cruz Bay or Red Hook would be preferable for most transient boaters, due to proximity of services, and easy transportation to the airport. Assumptions that significant services like customs, high end shops, professional skills and supplies in quantities for mega yachts will be possible economically to have available in remote Coral Bay for a short winter high season – are highly unrealistic. The planned market is too broadly based, and makes assumptions that will not materialize –thus there is no “need” for the size and scale of the Proposed Project.

Furthermore, EPA guidelines for marina design and site selection (EPA 840-B-92-002), require that project proponent consider redeveloping “coastal waterfront sites that have been previously disturbed; expand existing marinas or consider alternative sites to minimize potential environmental impacts.” P. 5-22. Coral Bay Harbor is undeveloped; there are alternatives on St. John that meet the above objectives.

Summary – see detail in attached Alternatives Analysis document.

Do nothing

1. Use one or more of three existing commercial bay/port areas which are very underutilized in Cruz Bay, and have convenient access to existing customs, gas dock, transportation and retail service facilities. These areas are under the control of VI Port Authority.

In addition to the under-utilized Cruz Bay facilities, the Do nothing Alternative, would recognize the existence of more than 200 National Park moorings, including 30-plus moorings for boats up

to 60 ft and mega yacht anchoring near Cruz Bay which already provides customs and other boating facilities.

Coral Bay Alternatives

2. Moorings (existing and/or new), day dock, fuel dock, sewage pumpout
3. Moravian church land marina – This is a proposed project that has yet to disclose plans. It is looking for investors. Current public dinghy dock is here, and a boat ramp for small boats up to 30 ft.
4. Usher Bay (East side of Harbor below Fortsberg)

Alternatives Analysis Review Using USACE Criteria

The Red and Black sections are copied from the USACE public presentation on Sept 3rd, 2014 on how Alternatives Analyses are conducted by the USACE:

▪ Applicant's Purpose and Need

- Applicant submits a purpose and need statement.
- Significant thought
- Drives the alternatives analysis under both NEPA and the Guidelines
- From the applicant's purpose and need statement, the USACE defines the basic and the overall project purpose.

CBCC comments in blue:

Applicant has defined project as serving all island of St. John.

Applicant has two different expressed purposes under NEPA

- 1) FWS BIG Grant – transient smaller boaters
- 2) MEGA Yachts, 145 slips, large sailboats, motor boats and 75 plus 12 moorings - ACE app.

Therefore the USACE's Alternatives Analysis must explore all options on St. John for providing marina and mooring services.

Overall Project Purpose

- Overall purpose defines the geographic scope.
 - The overall project purpose should be:
 - reasonably set to define the area of alternatives and
 - based on the project purpose
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Geographic scope for an Alternatives Analysis is the entire Island of St. John – (also easy access from BVI – which is also easier to reach than Cruz Bay , which may take activity to BVI (rather than from BVI))

SEG claims there are no services for transient boats on St. John. However, this is incorrect. The National Park and the Coral Reef National Monument have over 200 existing moorings exclusively for transient boaters, most for overnight mooring in seven different bays around St. John and more than eight other “snorkel stop” locations. These vacationing boaters than transit back to homeports in St. Thomas or the BVI – which are closeto airports at vacation’s end.

Reasonable Alternatives

- Applicant's preferred alternative
 - No action alternative
 - Alternative offsite locations (might have less impacts to WOTUS)
 - Onsite alternatives (with less adverse impact to WOTUS)
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Suggested alternatives to be considered:

1. Applicant's proposal
2. No Action Alternative current Coral Harbor mooring field (improved) and over 200 moorings throughout National Park and Monument
3. Off-site:
Controlled by VI Port Authority
 - a. Cruz Bay Creek,
 - b. Cruz Bay,
 - c. Enighed Pond Port.
 - d. Also Great Cruz Bay where Westin Hotel is.
 - e. Also consideration of two other Coral Harbor sites.
4. Onsite Coral Bay alternatives:
 - a. Smaller marina choices of many kinds
 - b. AIA plan and community recommendation: Lunch- daytripper dock with possible fuel service.
 - c. Moorings only and dinghy/launch dock

Reasonable Alternatives

- The maximum number of reasonable alternatives depends on the nature and scope of the proposed project.
 - The level of detail in an alternatives analysis should be commensurate with the scale of the adverse environmental effects of the project.
 - Larger projects with greater impacts
 - Smaller acreage of impacts but to high value aquatic resources
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Adverse environmental impacts of this project are HUGE, since it is virtually entirely positioned over seagrass beds with a mangrove forest downwind. This entire bay is EFH for numerous reef fish and other species and has special aquatic resources. These impacts are documented elsewhere in the comments.

Therefore a substantial alternatives analysis is required, with a high level of detail and accuracy about actual local conditions and choices. The reasonableness of the objective of the project is also called into question. There is no actual professional economic or market analysis presented to show that there is a market need for a marina of this type or that it could be financially successful, as is documented elsewhere in the comments.

The advantages of moorings vs. docks of any kind should be fully considered in the alternatives analysis – see attached summary comparison.

Practicable Alternatives *At a minimum*, the following general site information for each alternative site examined should be provided:

- Specific parcel information: aerial photos, location maps, and land use codes
 - Presence, quantity and quality of wetlands or other WOTUS
 - County/city zoning designation
 - Site infrastructure - new access roads/infrastructure
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As mentioned above – The CRUZ BAY side of the island already has the various basic infrastructure requirements – like water and sewer and customs – that could easily provide for the basic need of the Proposed Project. This infrastructure is completely

lacking in Coral Bay for projects of this scale. Therefore, these differences need to be considered fully.

See west coast St John map attached for all available west coast St. John Bays

Presence of seagrass and other WOTUS factors

Utilizes existing port area

ESA & EFH factors (less concerning at other locations)

SITE INFRASTRUCTURE:

Available customs

Available infrastructure (public water, sewer)

Available fuel, other services

Easy transport to airport, medical facilities, high volume shopping

Road access

Proximity to served population

Proximity/Access to National Park amenities

CRUZ BAY CREEK will rank #1 on all of the above factors, and (after the planned addition of a Red Hook St. Thomas customs facility for clearing vessels within the next two years) will be readily available for enhancement into a substantial transient and resident recreational and charter marina and marine services and docking area – should the VI Port Authority in



Figure 1 Cruz Bay and Cruz Bay Creek to the right

Addendum: ADVANTAGES OF MOORINGS VS. DOCKS FOR RECREATIONAL BOATS

Prepared by Philip Strenger for the Coral Bay Community Council

2/15

Moorings Environmentally preferable

No permanent change to harbor/seafloor

No constant shading of seagrass habitat

Moorings can be designed to avoid seagrass habitat damage (many already are)

Less expensive capital investment; asset survives hurricanes

Safer for boats in squall conditions, and tropical storm conditions, than marinas. Boats normally have to leave marinas in tropical storm conditions – where do they go?

Because moored vessels take up more total sea area than when boats are packed in at docks – Moorings self-regulate the vessel density of the harbor and limit the space available for transient vessels to anchor and damage seagrass. Less density means less concentration of boat toxins from bottom paint in the water, among other advantages.

Widely dispersed pattern of moored boats reduces speed of all vessel traffic, lessening chances of vessels traveling too quickly and scarring seagrass, or striking turtles or coral.



NP moorings

Cruz Bay Creek

Mega Yacht anchoring

Cruz Bay

Eneighed Pond

Great Cruz Bay

1" = 2168 ft



MAP FOR REFERENCE ONLY
NOT A LEGAL DOCUMENT

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