

SAJ-2004-12518 (SP-JCM)
St. John Marina Yacht Club

Exhibit 6 , Attachment B

*Letter from Jeff Boyd, President, Marine
Management & Consulting*



WE MEASURE OUR SUCCESS BY OUR CLIENT'S RESULTS.

Chaliese N. Summers
Managing Member
The Summer's End Group, LLC
5000 Estate Enighed, Suite #63
St John, U.S. Virgin Islands, 00830

RE: SAJ-2004-12518 (SP-JCM)

Dear Ms. Summers:

I have reviewed the comments posted by the Regulatory Division, South Permits Branch, Antilles Section SAJ-2004-12518 (SP-JCM) in its request for additional information dated January 26, 2018, regarding its concerns about proposed development of the St. John Marina Yacht Club, located at Coral Harbor, Estate Carolina, Coral Bay, St. John, U.S. Virgin Islands.

I have over twenty five years of experience across all fields of the Yachting Industry and I have actively been involved in all facets and levels of the business. Specifically, I provided consulting and management services for the design, development, construction and administration and the daily operational procedures for marinas, yacht clubs and shipyards in the Caribbean, Middle East and the United States. Over the past five years, I have focused on management strategies that facilitate the daily operations of a Marina /Yacht Club.

In my experience, marina site suitability analysis is a comprehensive, multidiscipline effort that employs wind/wave analysis, which is only one planning tool, using a series of assumptions to generate model runs useful for making decisions about marina design and operational tactics; it is not a substitute for human judgment. As a tool, it generates data for designers and operators to consider in making decisions about design, construction and operation of facilities that are suitable for the particular market segment(s) that the marina plans serve in the proposed site location. As a planning tool, it provides insights into likely scenarios that can be used to effectively design docking systems, align docking facilities, and plan for marina operations. Such an analysis, alone, is not dispositive in terms of the suitability of a site for a marina, nor is it a substitute for the business and operational judgment of the applicant who is undertaking the project. For an accurate assessment of site suitability, all analyses must be considered and weighted according to specific conditions.

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There are a number of options to address the findings of the wind/wave analysis from a structural and an operational basis. As part of developing the design for this marina, I have undertaken extensive site evaluations, along with the applicant of the project, and designed a marina facility to function under these specific conditions, including the fetch discussed in the analysis. Of note, during every site evaluation that was performed by my company, there were more than 100 vessels successfully moored within the harbor and many vessels safely moored within the area of our submerged land lease. This bay as long been a preferred safe harbor for mariners of all size vessels ranging from under 20' to over 50'.

Based on the wind/wave analysis, extensive site evaluations, and in collaboration with experienced engineers from Techno Marine who have engineered and manufactured over 1000 successful marinas globally, we have designed and engineered the marine structure to be sustainable and successfully function within its current location, under all predictable conditions.

Taking into consideration the conditions year round at the project site and from my many years of experience managing marina facilities and mega yacht facilities in the Caribbean including Yacht Haven Grand on St. Thomas and Port de Plaisance St. Maarten, I have designed the proposed marina to address the specific site conditions through structural engineering and operational methods that will be implemented by the management team.

The design as proposed by the applicant balances the operational needs of the marina with the regulatory requirements for environmental protection. As part of this effort, the applicant has determined to undertake the following infrastructure design and operational tactics will be used in lieu of seeking additional infrastructure, such as a floating wave attenuator or breakwater.

- a. The proposed marina design uses fixed docks which are designed to withstand greater wave heights than floating docks. These fixed structures also offer a permanent attachment between the vessel and the dock thus negating additional motion that would be found in a floating dock.
- b. The marina design provides more berths for larger boats, the average sized berth in the marina is 60 to 70 feet and the largest berth is 140 feet, in part because larger boats experience much less movement than small boats from the same incident wave conditions.

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- c. The proposed marina plan arranges berths so that the largest vessels are positioned towards the seaward and windward-end of the marina plan, and the smallest vessels are positioned towards the landward-end of the marina plan in the lee of the megayachts which effectively attenuate incident waves and reduce wave conditions towards the leeward-end of the marina where smaller boats are docked.
- d. The operational tactics will include:
 - i. Tiedowns for boats in the marina that will be adjusted by marina staff address changes in wind and wave as needed.
 - ii. The smallest berths in the marina, 36 feet, will use boat lifts to remove smaller boats from the water.
 - iii. This marina will require pre-authorization to enter or leave the marina. When conditions warrant, tenders will escort boats into and out of the marina.
 - iv. In more intense wind/wave events, boats will not leave the marina.
 - v. For hurricane conditions, the marina will be evacuated.
 - vi. Long term berths will also include expandable elastic shock chords inserted within the mooring lines thus mitigating the surge and or fetch and slowing the movement periods for the vessels

Coral Harbor has been the choice of yachtsmen and women for many years and it was, historically, the first port on Saint John. While there is a fetch with winds from the south/southeast, there are no wrap-around currents. In addition, I have reviewed several marinas in the Virgin Islands, which are presently in existence and successful in their operations, to determine how these marinas would fare under the analysis posed by the comments in Army Corps' most recent correspondence regarding this application. Each of these marinas faces the same or similar operational issues, including the challenge of a long fetch during certain wind/wave events. The use of good design and good judgment can effectively address these challenges. Otherwise, there would be no marinas in the Virgin Islands.

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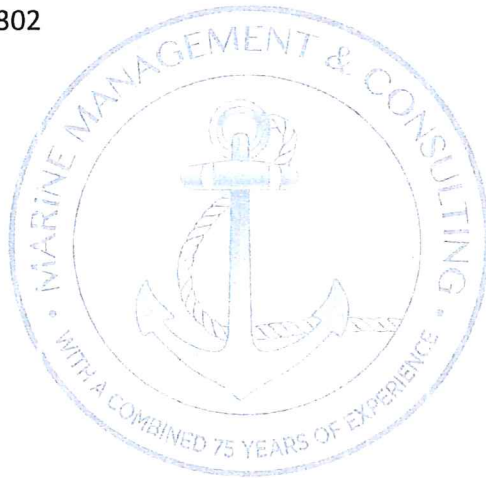
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In my professional opinion, the Yacht Club at Summer's End has taken appropriate measures from both the marina design and tactical operations standpoint to address the issues raised in the wind/wave modeling effort. If you require further explanation in this matter, do not hesitate to contact me.

Sincerely,

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Jeff D Boyd

President and Managing Director
Marine Management and Consulting N.V.
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