

Appendix M - Responses to Public Notice Comments by the Summer's End Group, LLC

August 2017

To: The U.S. Army Corps of Engineers

Re: Responses to Comments

Pleased find below the responses from the Summer's End Group, LLC in reply to comments submitted to USACE regarding the permit application for the St. John marina: The Yacht Club at Summer's End.

Comments are addressed per area of concern. Often a commenter(s) would cite a concern multiple times. Where this occurs, the concern was comprehensively addressed again. Every effort was made to see that each concern was given the consideration it deserves. Responses were generated and reviewed by the Summer's End team members who had the greatest expertise in the area of concern.

We hope all concerns have been addressed to the satisfaction of USACE and consulting agencies.

COMMENTS & RESPONSES

Area of concern: Proposed marina is too large (4)

Response: The size of the proposed St. John marina is predicated on 4 factors; 1) economy of scale which allows the support of short and long term environmental restoration and monitoring of Coral Harbor and surrounding waters, 2) a slip mix which gives the best chance of success which enables the facility to offer local boaters slips at competitive rates, 3) offering jobs in an area of St. John where native St. Johnians are suffering from economic hardship, and 4) current and future market needs.

Support for this response is found in the rebuttal and agency responses, Market Analysis, Economic Impact Analysis and The Truth About Coral Bay video.

Area of concern: Effects on existing way of life, lifestyle and conditions in Coral Bay (7)

Response: Generational St. Johnians have made their feelings very clear: Coral Harbor and Coral Bay are being destroyed by non-compliant boaters and those who have no concern or respect for local culture and families and their wants and needs. Change and restoration of harbor waters and organization in the bay is desperately needed and many locals feel the best way to accomplish this is through the proposed Yacht Club at Summer's End marina.

Support for this response is well articulated in The Truth About Coral Bay video.

Area of concern: Effect on character and uniqueness of Coral Bay and St. John (8)

Response: Coral Harbor is home to approximately 100 non-compliant boats and moorings. It is unique in all of the USVI to have this extreme and blatant disregard for the laws of the territory and regulations of the U.S. Environmental Protection Agency. According to many native St. Johnians, this "uniqueness" desperately needs addressing. The proposed St. John

marina will provide support and slip usage for any and all enforcement agencies of both the territory and federal governments.

A survey sponsored by the Coral Bay Community Council in 2013 asked this question: "In general, do you favor one or more marinas in Coral Bay?" 64.7% responded YES. In a follow up survey by CBCC a marina was the second most desired amenity for Coral Bay behind a gas station.

A "wish list" for what a marina in Coral Bay would provide was created by the Marina sub-group of the year-long Marine Uses Planning Group in 2013, sponsored by the CBCC. The list included: customs office, make Coral Bay and St. John boater friendly, services of ice, water & provisions, jobs, pump out for improved water quality and fueling. The St. John marina fulfills all of those wishes.

In the light of sustainability pillars of environment, social/cultural and economic concerns, the 2013 American Institute of Architects - Coral Bay Sustainable Development Assessment Team Report was dominated by social and cultural concerns. Negative trendlines cited in the SWOT Analysis of the AIA-SDAT report were; "erosion of indigenous culture, divided culture mentality, sense of futility and no hope, high unemployment, youth flight and lack of diversity," to name just a few. By its very existence through local economic stimulation and social inclusion, the St. John marina begins to reverse the economic hardship and genocide of generational St. Johnians.

The proposed St. John marina will address much needed changes in the "uniqueness" of Coral Bay especially in the areas of environmental restoration, economic hardship and lack of character and concern for native St. John culture and families.

Support for this response can be found in The Truth About Coral Bay video, 2013 AIA-SDAT Report, notes from Marine Uses Planning Group, marina sub-group meetings maintained by developer participants.

Area of concern: project fit for culture, character and size of Coral Bay (9)

Response: Generational St. Johnians see the development of the proposed St. John marina in Coral harbor as a vehicle through which local culture and character can be restored from its current degraded state. According to a 2012 NOAA research report Coral Bay measures 13.3 square kilometers, or 3,286.5 acres. Using USVI DPNR calculations, the proposed submerged lands lease for the St. John marina is 27.5 acres. In comparison, the lease for the proposed marina occupies less than 84/1000 of 1% of Coral Bay.

Support for this response can be found in The Truth About Coral Bay video and the Economic Impact Analysis for the St. John marina .

Area of concern: natural beauty, quietness and peacefulness of Coral Bay (10)

Response: The proposed YCSE marina will support the beauty of Coral Harbor by removing sunken and derelict boats, improving storm water management, and providing wastewater

pump out, helping to eliminate frequent malodorous conditions, and the addition of newly repaved roadway, hardscape, landscape and scenic boardwalk.

Quietness and peacefulness will be maintained as the proposed marina will simply be idling boats in and out of slips. There will be no repair facilities or dry dock which would cause additional noise.

Support for this response can be found in civil engineering drawings and storm water management plans.

Area of concern: Existing NPS moorings as alternative to marina (12)

Response: The approximately 200 moorings in VINP waters have a 3 night limit and overall restriction of 30 days per year, and do not offer what mariners refer to as "friendly access" to shore. Additionally, NPS moorings for vessels over 60' number less than a dozen in a market area that services over 800 vessels exceeding that length annually.

Support for this response can be found in the Market Analysis for the YCSE.

Area of concern: a smaller marina would better (15)

Response: A smaller marina, available to the public, is not possible due to the lack of economic viability and an imbalance in economy of scale. The costs far exceed the ability of revenues generated through a smaller facility to service the expense. If it were possible, it would have already been done as there is a significant need for a marina for St. John.

Support for this response is found in the breakeven analysis section of the Market Analysis.

Area of concern: existing moored boats (21)

Response: All legally moored boats within the footprint of the proposed submerged lands lease for the St. John marina will be relocated at developer expense, to a proper, inspected mooring whose location will be chosen, as cited in VI Code as a condition of all mooring permits, by the USVI Dept. of Planning and Natural Resources. The abandoned mooring will be removed by the developer and any damaged seagrass restored.

Support for this response can be found in the conditions of the DPNR CZM Major Water Permit for the proposed St. John marina.

Area of concern: zoning and Area of Particular Concern (22)

Response: Coral Harbor is a designated mooring area. The St. John marina's proposed location is on property specifically zoned for the proposed use and qualifies for a submerged land lease. An Area of Particular Concern is an area that needs additional planning and study. It does not prohibit development.

Support for this response can be found in USVI Code and zoning.

Area of concern: are boat sizes too large for Coral Bay (23)

Response: Coral Harbor is a natural, deep water harbor. It was selected by early settlers as the first "town" for St. John as the depth in the harbor allowed for ocean going vessels to deliver and receive goods and livestock to and from the island of St. John.

The fact that Fortsberg fort and a Custom's House were constructed in Coral Harbor further attest to its viability as St. John's best choice for large vessel conveyance. Remnants of Fortsberg fort and the old Customs House still stand today. Depths of 12-18' are found in YCSE south club docks.

Support for this response can be found on YCSE dock drawings, Google Earth and on site in Coral Bay.

Area of concern: possible adverse environmental and socio-economic impacts (29)

Response: The proposed St. John marina will have both negative and positive environmental impacts. Negative impacts have been addressed through avoidance, minimization and mitigation. Positive environmental impacts include the removal of sunken and derelict boats, providing proper wastewater and solid waste disposal, and improved boater education regarding the protection of VI National Park and National Monument resources, to name but a few.

Socio-economics impacts will be positive and significant. The creation of jobs, internship, mentorship and career development in the marine industry are but a few of the benefits provided by the St. John marina. Support for local youth and native families and their culture and heritage are additional benefits.

Support for this response can be found other environmental responses, the Economic Impact Analysis and The Truth About Coral Bay video.

Area of concern: reduction in visitation to St. John (30)

Response: As proposed, the St. John marina would have a significant positive impact on visitation to St. John. As an island, increasing access to St. John through the construction of a marina would only benefit visitor access. The marina also provides an additional outlet for marine recreation activities like day and weekly charters, sport fishing and tours, whose success is currently limited due to the lack of facilities which a marina provides. The few who would choose to no longer visit St. John will have a hard time finding an island without a marina that offers all that St. John offers. The net result of the addition of the St. John marina will only increase visitation, and thus increase participation of visitors in support of local community projects, initiatives and fundraising.

Support for this response can be found in the Economic Impact Analysis for the St. John marina.

Area of concern: effect on EcoTourism (32)

Response: An increase in visitors, and ease from which to market and conduct ecotours points to an expanded ecotourism market for St. John through the addition of a marina, particularly on the southeast end of the island.

Many aquatic ecotours take place in Hurricane Hole and other nearby bays and inlets of Coral Bay. Headquartering from the proposed St. John marina provides easy access and convenience for both tour operators and their guests. YCSE's sponsoring of periodic visits by park rangers to the marina to further illuminate and educate guests about both terrestrial and aquatic assets and their value, provides an additional boost for the ecotourism industry for St. John.

Support for this response can be found in the Economic Impact Analysis and discussion notes of meetings with YCSE development team & VI NPS.

Area of concern: decrease in hotel tax revenue (33)

Response: Scientific research indicates that there will be an increase in not only hotel tax, but nearly all taxes collected by the territory of the USVI with the development of the proposed Yacht Club at Summer's End in Coral Harbor, St. John. This conclusion is shared by IMPLAN, Tourism Economics and the World Travel & Tourism Council, all leading experts in the field.

Support for this response can be found in the Economic Impact Analysis for the St. John marina.

Area of concern: reduction in hotel service jobs (34)

Response: Because of the conversion of the Westin Hotel & Resort on St. John to timeshare, a reduction in hotel related employment is expected. With the significant addition of recreational marine careers through the proposed St. John marina, skills developed in the hospitality industry are easily transferred, and St. Johnians won't have to leave the island for work. Visitation to St. John will increase through the return of day and weekly charter visitors seeking to stay on land exclusively, or in conjunction with a marine vacation. Other local developers see visitation to St. John increasing and have proposed the construction of a new 200 room hotel in Cruz Bay.

Support for this response can be found in local St. John media stories and the Economic Impact Analysis.

Area of concern: displacement of local residents (35)

Response: The proposed YCSE marina will actually help reverse the loss of local population. According to the U.S. Virgin Islands Kids Count Data Book 2014 sponsored by Community Foundation of the Virgin Islands, between the 2000 and 2010 census the child population on St. John dropped a staggering 21%. The data book concluded:

"Many young families move away from the Virgin Islands to look for educational or job opportunities elsewhere, leaving behind an older population with fewer young children."

Because of direct and indirect job creation and positive economic impact, the St. John marina will now provide hope to local families in an area that has suffered from economic hardship for decades.

Support for this response can be found in the Economic Impact Analysis for the YCSE and the U.S. Virgin Islands Kids Count Data Book 2014.

Area of concern: possible adverse effects of marina construction and operation on local economy, businesses and tourism (36)

Response: There will be some inconveniences with the construction of the proposed project. However, great effort by developers has been expended to minimize those inconveniences. Any adverse effects will be temporary, and offset by an increase in consumption by construction workers and subcontractors. The long term effects of operations will be an increase in visitor traffic, jobs and a more sustainable local economy. Many native St. Johnians are looking forward to starting their own businesses that will answer visitor needs not answered directly by the YCSE marina.

Support for this response can be found in the Economic Impact Analysis.

Area of concern: possible loss of rental home ownership (37)

Response: Visitation to the USVI dropped significantly during the Great Recession. Nearly all rental villa owners survived this economic hardship. Developers of the St. John marina look to take advantage of the seasonality of villa rental and schedule the most distracting part of the development process during "slow" season. Again, the long term outlook for all businesses and villa rental owners is positive due to the increase of new and repeat visitors to St. John.

Support for this response is in the Economic Impact Report and The Truth About Coral Bay video

Area of concern: possible business closure due to competition from marina (38)

Response: Since there is no marina, anywhere on the island of St. John, there is no competition for slip rental or dockage. Existing and future upland businesses within and near the proposed YCSE marina complex will enjoy significant increases in customers and profits as a result of the development of the proposed marina.

Support for this response can be found in the Economic Impact Analysis of the St. John marina.

Area of concern: possible increase of property value and tax, and cost of living (39)

Response: With the development of the proposed St. John marina, economies of scale should actually lower cost of living for local residents, with the added benefit of an increase in family income due to new economic opportunities and jobs associated with the project.

Having lost significant value of property because of the Great Recession, much of which has been in families for generations, native property owners suffer from what they deem as unfair taxation plus the added burden of devalued property. This situation can only be resolved by territorial officials, who are currently addressing the situation. On one side of the equation is the taxation, but on the other side is the ability to pay that has been impaired due to a sluggish USVI economy which has yet to rebound like the US mainland. While the marina can't influence taxation, it will have a significant positive effect on families' ability to pay said taxes through increased economic and employment opportunities, and household incomes.

Support for this response can be found in the Economic Impact Analysis.

Area of concern: possible reduction in property values (40)

Response: Having a marina in a coastal community actually helps protect property values.

Support for this response can be found in the Market Analysis for the St. John marina.

Area of concern: objection to construction impacts and their duration (41)

Response: Every consideration has been given by developers regarding construction impacts so as to minimize and manage inconvenience local residents through timely scheduling of activities and their efficient completion.

Support for this response can be found in the Civil Engineering and Stormwater Management documents, and environmental analysis submitted

Area of concern: possible adverse effects on roads and traffic (42)

Response: A critical element of a tourism economy is transportation. Current infrastructure has been studied and evaluated and has been determined to meet community needs with the addition of the proposed YCSE marina project. However, the development of the marina will result in significant infrastructure improvements including taking overhead utilities underground, the addition of boardwalk, sidewalks, landscape and hardscape, and bus stop where none currently exists, raised crosswalks, new taxi loading and queuing areas, and the resurfacing of hundreds of feet of roadway. Infrastructure and the ability to transport both residents and visitors will be dramatically improved with the construction of the St. John marina.

Support for this response can be found in Traffic Impact Study, Yacht Club at Summer's End by Horner & Canter Associates and civil engineering documents submitted.

Area of concern: emotional effects (43)

Response: Some people respond better to change than others. It is suggested that those experiencing emotional distress during the construction or operation of the proposed St. John marina seek support through the Emmaus Moravian Church, Calvary Baptist Church or the Our Lady of Mt. Carmel Catholic church, all located in Coral Bay. These spiritual communities are deeply committed to the spiritual and emotional wellbeing of all those who seek their wise council. For those seeking a more secular approach, St. John has many community activities and organizations with which someone experiencing emotional distress could find a greater meaning or purpose in their life thereby gaining a healthier perspective. St. John is also home to several counselors who are trained to aid in times of emotional distress. Finally, the project principals are happy to meet with anyone to help them gain a better understanding of the development and the positive effect it will have on the community.

Support for this response can be found in The Truth About Coral Bay video and connecting with the above suggestions.

Area of concern: contrary to public interest (44)

Response: The vast majority of native St. Johnians and people of color who comprise 71% of St. John's population, support the development of the St. John marina and feel that it is long overdue, citing the environmental, social and economic benefits. Additionally, a survey of white residents sponsored by the Coral Bay Community Council in 2013 asked this question: "In general, do you favor one or more marinas in Coral Bay?" A large majority, 64.7% responded YES. In a follow up survey by CBCC a marina was the second most desired amenity for Coral Bay behind a gas station.

Support for this response is found in The Truth About Coral Bay video & accurate CBCC survey results on file with the Summer's End Group.

Area of concern: EAR vs. EIS (46)

Response: USACE has determined that an EAR is sufficient, and that and EIS is not required.

Support for this response is indicated in USACE determinations, and rebuttal and agency responses along with all of the studies and plans submitted in support of this project.

Area of concern: possible adverse impacts to aesthetics of Coral Bay (56)

Response: The vast majority of native St. Johnians living in and near Coral Bay feel the development of the Yacht Club at Summer's End marina will improve community aesthetics of Coral Bay in a number of areas including water quality, malodorous environment, a harbor free of sunken & derelict vessels, more respectful and compliant boating community, and viewscape.

Support for this response is found in The Truth About Coral Bay video and civil engineering and stormwater management documents.

Area of concern: possible adverse impacts to viewshed (57)

Response: A beautiful marina in a quiet, well managed harbor is considered an improvement to a viewshed that is currently identified by derelict and sunken vessels, waters that are treated as a sewage receptacle and environmentally harmful, non-compliant boating. Community improvements of taking overhead utilities underground, addition of boardwalk, sidewalks, landscape and hardscape, and bus stop where none currently exists, raised crosswalks, new taxi loading and queuing areas, and resurfacing of hundreds of feet of roadway all contribute to an improved viewshed.

Support for this response is found in The Truth About Coral Bay video and proposed project civil engineering documents & images contained within permit application and responses.

Area of concern: possible viewshed impact & reduction in property values (58)

Response: With the completion of the development of the proposed St. John marina in Coral Harbor, local property owners will see an improved viewshed, and a stabilization and recovery of property values that has experienced a negative trend line for the past 9 years.

Support for this response is found in the Economic Impact Analysis and Market Analysis for the St. John marina.

Area of concern: effect on cultural values of the local Moravian church and Fortsberg Hill (59)

Response: The Board of Stewards, Board of Elders and the vast majority of active members of the Emmaus Moravian Church in Coral Bay are enthusiastic and emphatic supporters of the proposed Yacht Club at Summer's End marina. The values of revering local culture and history will be restored through the reversal of economic hardships which have caused many generational St. Johnians to leave the island, whereby vacated locals are no longer available to carry on centuries old folkways, mores and customs. Fortsberg fort is the site of the 1733 slave revolution that took place on St. John. It is owned by a local family who, with additional visitors from the marina, would have the opportunity to share it as a tourist attraction promoting the cultural and historical significance of Fortsberg.

Support for this response can be found in The Truth About Coral Bay video and Market Analysis.

Area of concern: project effect on Laurence Rockefeller legacy (60)

Response: The proposed St. John marina will have an extremely positive effect on the legacy of Lawrence Rockefeller. Rockefeller was a businessman, financier, philanthropist and conservationist. The Virgin Islands National Park is in desperate need of attention and has \$16,817,536 worth of deferred maintenance according to a 2016 NPS report. St. John is also suffering a crisis of cultural degradation and economic loss of local families. With the visitation to St. John by wealthy mega yacht owners, the spirit of caring evidenced by Rockefeller could be respectfully solicited from yacht owners and their friends to address the many social ills on St. John including the lack of a high school, and the replacement of the 1-8 grade school which is literally falling apart.

Support for this response can be found in Giving USA: The Annual Report on Philanthropy 2016 and the Economic Impact Analysis of the St. John marina.

Area of concern: economic viability of project (63)

Response: The much needed St. John marina is economically viable.

Support for this response is found in the Market Analysis and Economic Impact Analysis for the St. John marina.

Area of concern: demand for project, market study (64)

Response: An exhaustive, pervasive and comprehensive market study has been completed proving the current and future need of a marina on St. John, the size and scope as the one proposed, which services a wide variety of vessel types.

Support for this response is found in the Market Analysis for the Yacht Club at Summer's End. It is also worth noting that the Moravian Church/T-Rex have prepared a market study for their proposed marina which assumes that YCSE will be constructed, and concludes that there is demand for both marinas.

Area of concern: developer's ability to fund project (65)

Response: The developers of the St. John marina, the Yacht Club at Summer's End have in the past and continue to demonstrate their ability to successfully fund the development as evidenced by the approval of both Major CZM Land and Water Permits through the USVI Dept. of Planning & Natural Resources, confirmation of those permits through the USVI Board of Land Use Appeals, and the permit application and response to comments with the U.S. Army Corps of Engineers.

Support for this response is found in the actions described above.

Area of concern: inadequate or inappropriate compensatory mitigation (66)

Response: Protection and good stewardship of the St. John environment is highly valued by the Summer's End Group, as the majority of ownership is held by native St. Johnians and full time residents of St. John. Mitigation measures have been given full attention through extensive discussions with various federal agencies and departments to see that fair and equitable mitigation measures have been achieved.

Support for this response can be found in the mitigation measures proposed through successful negotiations with USACE and consulting agencies.

Area of concern: shoreline accessibility (74)

Response: Environmentally considerate shoreline access in Coral Harbor is currently nonexistent in Coral Harbor. Current access is limited to anchoring and or wading through

seagrass beds, or an illegal dingy dock that has violated USVI Code and US laws and environmental rules for decades. The proposed Yacht Club at Summer's End will provide legal and environmentally considerate access to shore with a permitted dingy dock and marina.

Support for this response is found in marina dock specification drawings by Technomarine.

Area of concern: project location effect on navigation, sailing and recreation within Coral Bay (75)

Response: The location of the proposed St. John marina will enhance the safe navigation of Coral Harbor as new navigational markers indicating the harbor channel will serve as a guide to safe navigation 24 hours day and night which currently does not exist. Navigation, including that for sailing vessels, will be easier and safer due to the additional navigational aids provided by the proposed marina. Removal of sunken and derelict vessels, along with the nearly 2 acres of blue belt between marina docks and shoreline and planting of red mangroves will enhance the recreational experience by providing greater habitat for marine life and a safer way for it to be experienced.

Support for this response can be found in CZM Major Land and Water Permit application and approval.

Area of concern: potential impacts from oil/fuel spill from boats (76)

Response: Fuel dock and in-slip fueling will meet US EPA standards and guidelines, minimizing the possibility of a fuel spill. In the extremely rare event of an accidental fuel or oil spill, marina staff will be trained and fully equipped to manage and abate any unlikely occurrence. Fuel tanks are located at the highest point of the development at 10' above sea level and have a 1' thick concrete containment of 110% of tank capacity to maximize safety and completely contain even the most minor spillage. Fuel tanks are to be installed to meet or exceed all territorial and federal requirements. Fueling system will also be equipped with reverse flow system allowing fuel lines feeding the dock to be emptied and fuel returned to tanks in the event of an emergency such as hurricane, tsunami or other potential threat. Currently there are no measures in place in Coral Harbor to prevent or remediate oil and fuel spills, which currently is not an uncommon occurrence.

Support for this response can be found in upland civil drawings.

Area of concern: developer experience and expertise (77)

Response: The development team for the St. John marina, the Yacht Club at Summer's End has over 125+ years of combined development and construction experience including the design and construction of over 100 marinas worldwide.

Support for this response can be found in statements of qualifications of team members, consultants, contractors and manufacturers.

Area of concern: project benefiting only small, wealthy minority (78)

Response: The proposed St. John marina benefits a wide range of socio economic strata; including small power and sail boat owners, non-boat owner Coral Bay residents via community improvements, anyone who appreciates a cleaner, healthier harbor, and native St. Johnians who've suffered economic hardship through a lack of jobs and economic opportunity. The St. John marina was designed from a foundation of sustainability whereby the entire Coral Bay community and island of St. John, as well as the owners of boats of all sizes and types, and vacationers coming via land and sea would enjoy and benefit in the areas of environmental, social and economic restoration and improvement.

Support for this response is found in The Truth About Coral Bay video and the Economic Impact Analysis.

Area of concern: marina serving large yachts not in St. John's best interest (80)

Response: Currently large yachts must anchor offshore of St. John and do so often during season damaging sea grass and other SAV, negatively impacting the environment. The latest addition of moorings accommodating vessels 60-100' in National Park waters by Friends of the Park supports research that more and more large vessels are intent on visiting St. John. The proposed YCSE marina helps protect National Park and Monument resources by providing an environmentally considerate way to access and visit St. John. YCSE, in concert with the VINPS, is committed to serve as an information conduit for NPS preservation efforts through YCSE's website, mobile phone applications and other media, as well a funding a park ranger part time to further inform boaters on their responsibility and opportunity to help protect the sensitive marine environment around St. John.

Support for this response is found in rebuttal and agency responses, marina design concept, Economic Impact Analysis, Market Analysis for the St. John marina, and The Truth About Coral Bay video.

Area of concern: proponents only interest is making money (81)

Response: The principals involved in the development of the St. John marina include generational St. Johnians whose families were caretakers of the island long before there was a national park, Lawrence Rockefeller or influx of US mainland continentals to St. John. All local principals are deeply involved in community concerns including but not limited to a cleaner, more beautiful Coral Harbor, waste management, stewardship of water resource potential, child education, economic opportunity and restoration of native culture. The proposed YCSE marina is like any other business on St. John, it must be profitable in order to provide a service to its clientele, jobs for its employees and support for community improvements and concerns including a healthier environment for local families and visitors alike.

Support for this response can be found in select statements of qualifications of Summer's End Group, LLC principals.

Area of concern: number, types, availability and benefits of jobs (82)

Response: Total, one time jobs attributable to the development of the St. John marina total 210 in the industries of construction and utilities, business services, finance, insurance, real estate, retail trade, food and beverage, education and health care, communications, personal services, wholesale trade, manufacturing and transportation to name a few. Direct, full time, long term jobs associated with the proposed YCSE marina total 81, 20 of which will be employees of the marina in positions including marina manager, assistant manager, accountant, concierge/clerk, dock manager, maintenance technician, security chief and guards. These jobs will be made available to local St. Johnians. Additionally, developers will implement mentorship, internship and scholarship programs to ensure qualified local talent to fill available positions for the benefit of local families, with the added benefit of sharing local culture and personality with marina guests.

Support for this response can be found in the Economic Impact Analysis and The Truth About Coral Bay video.

Area of concern: jobs going to outsiders or transient visitors and not locals (83)

Response: One of the fastest growing segments of tourism is cultural tourism. The developers of the proposed St. John marina intend for local culture to be a big part of the appeal of the St. John marina as its employment efforts will target locals in an effort to capitalize on cultural tourism. To accomplish this developers will implement mentorship, internship and scholarship programs to ensure qualified local talent to fill available positions for the benefit of local families, with the added benefit of sharing local culture and personality with marina guests.

Support for this response can be found in the Economic Impact Analysis, Market Analysis and The Truth About Coral Bay video.

Area of concern: effect on local fisheries and fishermen (85)

Response: The local fishermen of Coral Bay currently vend from the side of the road in unsafe and unsanitary conditions. Luckily, neither fishermen nor customers have been harmed by vehicular traffic, but it is only a matter of time. The proposed St. John marina development includes a Fish and Farmers Market which will provide a safe and sanitary location from which local fishermen can sell their fresh catch to eager marina slip occupants, and local residents and visitors who'll access the market from safe, off street parking. Local fisheries will be positively impacted with the addition of red mangroves to the shoreline providing additional habitat and nursery for sea life.

Support for this response is found in the St. John marina application, rebuttal and agency responses, and Economic Impact Analysis.

Area of concern: competition from Cuba effect on project viability (86)

Response: The primary market area of the proposed St. John marina of the northern Leeward Islands does not include Cuba, as it is out of the market area. Possible increased traffic to Cuba and the northern Caribbean would be an ancillary benefit to the YCSE marina as it would be ideally located geographically as a rest stop or as part of a charter or cruiser itinerary that

would include Cuba. Cuba is already an open market for all non-U.S. vessels, so any effect by Cuba is already partially addressed.

Support for this response is found in the Market Analysis for the St. John marina.

Area of concern: performance bond requirement for restoration in case of project failure (90)

Response: Both completion and restoration bonds are conditions of the Major Land and Water Permits issued by St. John CZM and USVI DPNR.

Support for this response can be found in St. John marina CZM Major Land and Water Permits.

Area of concern: boat traffic and public safety impacts (91)

Response: According to the U.S. Coast Guard, Coral Bay is a navigable waterway whose transit is governed by the laws, rules and regulations of the territory of the U.S. Virgin Islands and the United States government. In an effort to aid in compliance the St. John marina development includes the addition of a clearly marked channel that can be seen day or night, free dockage to any and all territorial and federal enforcement agencies, and an informational conduit via all YCSE media through which the National Park and other enforcement agencies can inform the boating public on information regarding safe boating.

Support for this response can be found in U.S. Coast Guard charts, territorial and federal rules and regulations, and proposed mitigation efforts.

Area of concern: possible lack of workforce on island (94)

Response: Many native St. Johnians have marine, boating and marina experience having grown up on an island. It is not unusual for a local to have their captain's license. Other St. Johnians have accrued years of experience in the hospitality industry working at Caneel Bay or Westin resorts, or through other tourism related businesses and activities. The developers of the St. John marina, several of whom are native St. Johnians, are firmly committed to hiring locally long term as evidenced by their investment in mentorship, internship and scholarship programs. Additionally, the St. John marina will host Coral Bay's first job fair prior to opening to identify any and all local interest in available YCSE jobs.

Support for this response can be found within the St. John marina permit application, the Economic Impact Analysis, Market Analysis and The Truth About St. John video.

Area of concern: possible rise in crime and drug use rates (96)

Response: FBI and VIPD statistics show higher unemployment equals higher crime and drug use rates. The proposed St. John marina will significantly aid in the decrease of unemployment in Coral Bay and St. John, thus actually help in lowering the crime and drug use rates.

Support for this response can be found within the FBI Uniform Crime Report Program.

Area of concern: control of the bay (97)

Response: Native St. Johnians are extremely dissatisfied with how Coral Harbor has been unofficially managed by 2 self-appointed groups much to the detriment of the environment and local culture. The majority of generational St. Johnians see the development of the St. John marina in Coral Harbor as a way to clean up and reclaim the bay for all, not just a select few.

Support for this response can be found in The Truth About Coral Bay video.

Area of concern: marina % of occupancy of bay and littoral rights (98)

Response: According to a 2012 NOAA research report Coral Bay measures 13.3 square kilometers, or 3,286.5 acres. The proposed submerged lands lease as determined by USVI DPNR for the St. John marina is 27.5 acres. By comparison, the lease for the proposed marina occupies less than 84/1000 of 1% of Coral Bay. The USVI's Department of Natural Resources, through their St. John Coastal Zone Management concluded that the littoral rights of neighboring properties near the proposed YCSE marina would not be infringed upon. On appeal, CZM's conclusion was substantiated by the U.S. Virgin Islands Board of Land Use of Appeals (BLUA). Both CZM and BLUA decisions had zero votes against the approval of both Major Land and Water Permits for the proposed St. John marina.

Support for this response can be found with USVI DPNR and BLUA records.

Area of concern: occupancy of nearby marinas and their solvency (99)

Response: Empirical data points to a healthy market area for the proposed St. John marina, and that all well maintained and managed marinas in the market are enjoying healthy occupancy rates and success. There are no other marinas on St. John; nearby marinas would be located on St. Thomas in the U.S. VI and Tortola in the British Virgin Islands.

Support for this response is found in the Market Analysis for the St. John marina.

Area of concern: project will impact Danish ruins and cannons to build a gated community (100)

Response: Neither permit application with the territory of the USVI or the US ACE for the proposed St. John marina include a gated community, Danish ruins or cannons.

Support for this response is found within permit applications with USVI DPNR and US ACE.

Area of concern: impacts to local community and ecosystem outweigh need and benefits of a marina at Coral Bay (101)

Response: Generational St. Johnians and those of Afro-Caribbean decent make up 71% of St. John's population. They are grievously concerned about the degradation of Coral Harbor's ecosystem due to the presence of non-compliant boating activities over the past two decades. Locals also point to their loss of culture due to a decline in their population caused by a lack of

jobs and economic opportunity in Coral Bay and on St. John. The vast majority of native St. Johnians see the St. John marina as a way to reclaim the health of Coral Harbor and begin the process of restoring local culture through the economic opportunities and jobs that come with the development of the St. John marina.

Support for this response is found within The Truth About Coral Bay video, rebuttal and agency responses, and the Economic Impact Analysis.

Area of concern: input from the local community

(102)

Response: The vast majority of native St. Johnians and people of color who comprise 71% of St. John's population, support the development of the St. John marina and feel that it is long overdue, citing the environmental, social and economic benefits. Additionally, a survey of white residents sponsored by the Coral Bay Community Council in 2013 asked this question: "In general, do you favor one or more marinas in Coral Bay?" A large majority, 64.7% responded YES. In a follow up survey by CBCC a marina was the second most desired amenity for Coral Bay behind a gas station.

St. John marina principals through their participation in a year long, public Marine Uses Planning Group meetings held at the Guy Benjamin School in Coral Bay, the American Institute of Architect's – Sustainable Development Assessment Team research and report, meetings with the leadership of the 230+ year old Emmaus Moravian Church in Coral Bay, other St. John church leaders and other community organizations have designed the proposed marina to support the restoration of this once pristine area of Coral Harbor and Coral Bay, and local community and culture desires. With the cleanup of Coral Harbor by the proposed St. John marina, proper harbor management and enforcement in place, and services and facilities to support the legal and respectful use of the bay, the St. John marina should be able to qualify for Blue Flag status, which under the harbor's current condition is impossible.

Support for this response is found in The Truth About Coral Bay video and accurate poll results on file with the Summer's End Group.

Area of concern: consensus of community regarding the proposed St. John marina

(103)

Response: The vast majority of native St. Johnians and people of color who comprise 71% of St. John's population, support the development of the St. John marina and feel that it is long overdue, citing the environmental, social and economic benefits. Additionally, a survey of white residents sponsored by the Coral Bay Community Council in 2013 asked this question: "In general, do you favor one or more marinas in Coral Bay?" A large majority, 64.7% responded YES. In a follow up survey by CBCC a marina was the second most desired amenity for Coral Bay behind a gas station.

Support for this response is found in The Truth About Coral Bay video and accurate poll results on file with the Summer's End Group.

Area of concern: denigration of Fortsberg site by residential development

(108)

Response: Neither permit application with the territory of the USVI or the US ACE for the proposed St. John marina includes a residential development.

Support for this response is found within permit applications with USVI DPNR and USACE.

Area of concern: USACE procedure requesting comments on 2nd public notice

(115)

Response: Developers of the proposed St. John marina have faithfully and thoroughly followed the permit application process of both the territory of the USVI and the USACE, including public hearing before the St. John Coastal Zone Management Committee, and responses to public comments in both the CZM and US ACE process.

Support for this response can be found within the permit applications to USVI DPNR and USACE for the proposed St. John marina, and responses to comments associated with both.