



United States Department of the Interior

NATIONAL PARK SERVICE
Virgin Islands National Park
Virgin Islands Coral Reef National Monument
1300 Cruz Bay Creek
St. John, VI 00830



IN REPLY REFER TO:

August 28, 2014

Mr. Jean-Pierre L. Oriol
Director, CZM
8100 Lindberg Bay, Ste 61
Cyril E. King Airport Terminal
St. Thomas, USVI 00802

Dear Mr. Oriol,

I am writing to provide comment on a pending CZM permit (CZJ-4-14(W)), for the St. John Marina – Summer's End Marina in Coral Harbor on St. John. I have read the permit request and applicant supplied Environmental Assessment Report (EAR) on file at the library here on St. John. The applicant is requesting a permit to construct a 145 slip marina, 12 moorings with associated land based facilities and amenities in Coral Bay/Coral Harbor here on St. John. According to the EAR, an additional 75 mooring buoys will be placed in a proposed partnership with the Virgin Island Department of Planning and Natural Resources (DPNR).

I am writing to express my concern about the potential negative impacts to the resources of Virgin Islands National Park and Virgin Islands Coral Reef National Monument as a result of the increased vessel traffic associated with this large proposed project. Given the proximity of the development to the Park and Monument I am disappointed to see that the EAR makes no mention of the potential negative impacts to either. As you are aware the Parks authorized boundary encompasses all of the Fortsberg area down to the water line including that part contiguous with Coral Harbor. This area of the boundary is directly opposite and within 1/8th mile of the proposed development. The Hurricane Hole area of the Monument is only 1.5 miles away via water and approximately 1 mile as the crow flies.

The Monument includes 20.3 square miles of submerged lands that adjoin Virgin Islands National Park while the Park contains some 8.7 square miles of waters along the South and North shores of the island. The Monument contains all the elements of a Caribbean tropical marine ecosystem. The biological communities of the monument live in a fragile, interdependent relationship and include habitats essential for sustaining and enhancing the tropical marine ecosystem, which includes mangroves, seagrass beds, coral reefs, octocoral hardbottom, sand communities, shallow mud and fine sediment habitat, deep algal plains, and other hard bottom habitats. The fish habitats, deeper coral reefs, octocoral hardbottom, and other hard bottom habitats of the monument are all objects of scientific interest and essential to the long-term sustenance of the tropical marine ecosystem.

The clear waters of the Monument support a diverse and complex system of coral reefs. The health of these coral reefs is closely tied to plants and animals inhabiting the reef as well as adjacent non-coral marine environments such as sandy bottoms, seagrass beds, and mangrove forests. The submerged monument lands contain representative examples of the entire range of tropical marine ecosystems including shallow water mangrove nursery habitats, deep water spawning habitats that are essential to the overall function and productivity of regional fisheries, and habitat for great whales which forage, breed, nest, rest, or calve in the waters.

The monument contains biological objects, including several threatened and endangered species, which forage, breed, nest, rest, or calve in the waters. Humpback whales, pilot whales, four species of dolphins, brown pelicans, roseate terns, least terns, hawksbill sea turtles, leatherback sea turtles, and green sea turtles all use portions of the monument. Countless species of reef fishes, invertebrates, and plants and algae utilize these submerged lands during their lives, and over 25 species of seabirds feed in the waters. Between the near shore nursery habitats and the shelf edge spawning sites, habitats in the monument play essential roles during specific developmental stages of reef associated species, including spawning migrations of many reef fish species and crustaceans.

Virgin Islands Coral Reef National Monument was established on January 17, 2001, by Presidential Proclamation 7399 to provide greater protection to sensitive coral reef resources located within federally owned submerged lands beyond Virgin Islands National Park. The proclamation prohibits all boat anchoring in the Monument, except for emergency or authorized administrative purposes. The proclamation also prohibits all extractive uses, except for bait fishing at Hurricane Hole and for blue runner (hardnose) line fishing in the area south of St. John, both by permit only. Permits for bait fishing and hardnose fishing are allowed “to the extent that such fishing is consistent with the protection of the objects identified in this proclamation.” In addition to these restrictions and others, personal watercraft are prohibited from operating in the park and the monument under federal regulations.

My area of greatest immediate concern, due to its geographic proximity to this proposed marina development is Hurricane Hole. The submerged monument lands within Hurricane Hole support the most extensive pristine and well developed mangrove habitat on St. John. The monument provides spawning stocks and critical developmental habitats that allow for the restoration of depleted fishery resources and enhancement of adjacent fishing grounds. The area offers outstanding opportunities for education and scientific research due to the diversity, complexity and relationship of the natural resources and provides a dynamic laboratory for study and learning.

Aside from the Hurricane Hole area, the majority of the Monument and some of the most pristine beach and marine habitat in Virgin Islands National Park lie due south of Coral Harbor on the South side of St. John with immediate access from this development. In addition to the Park and Monument, Lagoon Point, a National Natural Landmark is located in Coral Bay directly along the transit routes to and from the proposed marina.

This project proposes construction of dock facilities for 145 vessels in a harbor area where there is currently only a small dingy dock. In reading the proposal it appears that designers of the new facility anticipate that approximately 45 of these slips will be for vessels of 90' to 140' in length with another 20+ of the slips for vessels over 45' in length. It can be expected that each of the 90'-140' vessels will also have a tender which would be a vessel of between 16' to 30' in length, while many of the "smaller" vessels between 45' and 55' in length will have a dingy of 14' to 16' in length. There is mention of a letter of intent with VI DPNR for management of a 75 vessel mooring field(s) north and east of the dock facility. Finally there are an additional 12 moorings identified for vessels 45' to 75' in length. The potential marine traffic impacts would need to consider a conservative estimate of an additional 75 vessels used as tenders and for recreational purposes by these larger yachts.

The only place in the permit where I find mention of Virgin Islands National Park or Virgin Islands Coral Reef National Monument is in Section 9, in which the applicant states that the "largest factor" in locating this marina is its proximity to the Park and Monument and the proliferation of corals contained therein. What is most disturbing, given this statement is the complete lack of consideration given by the applicant to the potential negative cumulative impacts to Park and Monument resources caused by the increased vessel traffic associated with the marina. There is no evidence of consideration or thought given to impacts on water quality, marine resources, wetlands (mangrove areas), coral reefs, sea grasses, fish and marine invertebrates and species of concern protected by the Endangered Species Act. There is no indication of consideration of impacts to Park and Monument soundscapes, lightscapes or cultural and archaeological resources; not to mention visitor use and experience.

Given that the applicant indicates that the single most important reason for locating the marina in Coral Harbor is the proximity of Park and Monument resources, I would ask that your office not issue a permit until the impacts on these critical resources are adequately considered with mitigation for negative impacts identified and required as a condition of this permit.

Thank you for your consideration on this matter.

Sincerely,



Brion FitzGerald
Superintendent