



Mr. José A. Cedeño-Maldonado
Antilles Permits Section
400 Fernández Juncos Avenue
San Juan, Puerto Rico 00901-3299

August 17, 2015

Subject: Proposed Coral Bay Marina -- Application SAJ-2004-12518 (SP-JCM)

Dear José A. Cedeño-Maldonado,

I am writing on behalf of the board of directors and members of Friends of Virgin Islands National Park. We are a membership organization dedicated to advancing the protection of the natural resources, preservation of the cultural resources, and promotion of the responsible enjoyment of this unique national treasure. Virgin Islands Coral Reef National Monument as it is adjacent to, and managed by, VI National Park, falls within our interests and concerns.

We have about 3,000 members: about 20% are from the Virgin Islands and the balance represents every state in the union and a dozen foreign countries (you may have heard from some of them already). We join together to voice our serious concerns about the proposed marina and urge you to deny the application.

There is widespread concern about this development on social, economic, and environmental grounds. In addition, the viability of its location and its feasibility as a sustainable business is also called into question. However, as advocates for the resources of Virgin Islands National Park and Coral Reef National Monument we are particularly alarmed about the serious threat this development poses for these natural, and national, resources.

We are convinced that this marina would be a significant threat to nearby NPS-protected lands and waters. VI National Park boundaries about the site of the proposed marina and the waters of VI Coral Reef National Monument are only a mile away as a gull flies and 1½ miles by water.

Within Coral Harbour the proposed marina would eliminate a minimum of nine acres of sea grass beds, create a sizeable obstruction to water flow in the bay, add an unknown amount and number of contaminants to the bay waters from all the vessels and generally lead to severe degradation of water quality. There are no physical barriers in the sea and the degradation of the waters of Coral Bay will have a negative impact on the waters of nearby Hurricane Hole, and beyond.

The National Monument contains significant biological flora and fauna, 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, 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. These are threatened by the marina and the development has given no consideration to the potential negative cumulative impacts to park and monument resources caused by significantly increased vessel traffic.

Mitigation measures proposed by the developers, such as planting sea grass where there is none presently (and where they probably would not grow), and planting mangroves in an area unsuitable for mangroves, are simply not adequate. The Environmental Assessment prepared for this marina gives no consideration to impacts to the monument's water quality, marine resources, wetlands (mangroves) coral reefs, sea grasses, fish, marine invertebrates, and species of concern protected by the Endangered Species Act. In addition, despite touting the marina's proximity to VI National Park and Coral Reef National Monument, the developers have not made any assessment of the impact of the marina on these delicate resources.

Hurricane Hole is the most critical area within the Coral Reef National Monument. It is a series of mangrove-bordered pristine bays, managed as a marine protected area, which serves as a nursery for fish that will populate the reefs to the south and east of St. John. It is also home to 30 of the 45, or so, coral species found in the Virgin Islands. The degradation of the water quality in these bays and the many impacts of increased visitation to the bays that a large nearby marina would imply would have a devastating effect on this area.

An example of how such a marina project might impact natural resources can be seen at North Sound on nearby Virgin Gorda in the British Virgin Islands. The combination of the mega-yacht marina at the entrance to Biras Creek and the resort development at Oil Nut Bay has resulted in an enormous increase in boat traffic among the shallows and what once were pristine corals of Eustatia Sound and Oil Nut Bay. Large yachts inevitably are accompanied by great numbers of small fast tenders and a plethora of personal watercraft used not only for transportation to and from shore but for exploring and joy-riding. The wakes, the stirring up of the bottom sediments in shallow water by propellers, and the noise all are detrimental to the marine resource preservation goals of the National Monument and the National Park.

I again urge you to deny this application and join us in protecting these unique national treasures.

In addition, in the case that you do not deny this application outright, due to the significant public interest in the project I encourage you to hold public meeting on the application.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Kessler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joe Kessler, President
Friends of Virgin Islands National Park