

*Save Coral Bay, Inc.
9901 Emmaus
Coral Bay, St John, USVI 00830*

Mr. Shawn Zinser, Chief, Regulatory Division, Jacksonville
Ms. Alisa Zarbo, Chief, Palm Beach Gardens Section
United States Army Corps of Engineers

20 September 2021

Subject: **NHPA Section 106 Consulting Party Status Request**

Dear Ms. Zarbo and Mr. Zinser,

I am writing to you regarding an ongoing investigation of historic artifacts of significance in Coral Harbor, Coral Bay, St John, US Virgin Islands. It is my understanding that your office has initiated a Section 106 consultation with the Virgin Islands State Historic Preservation Office (“VISHPO”) regarding the discovery of a well preserved early 18th century shipwreck within the footprint of a proposed marina currently being reviewed for permitting by the Jacksonville District of the Army Corps of Engineers.

As introduction, I am the President of a 501(c)3 nonprofit organization known as “Save Coral Bay Inc.” Our organization has been extensively involved with the Army Corps on a wide range of environmental and public interest concerns regarding the project, known as the “St John Marina” proposed by the permit applicant, “The Summers End Group, LLC.” The Army Corps permit application number for the proposed marina is SAJ-2004-12518.

Save Coral Bay has been actively participating in all aspects of the permitting of the proposed Summers End Group marina since it first applied for an Army Corps permit in 2014. We have submitted hundreds of pages of detailed comments on the project, including expert commentary on its environmental effects, economic effects and social and cultural effects on the community of Coral Bay and the island of St John. Our involvement is clearly documented in the administrative record for this undertaking.

Due to our direct involvement in all aspects of this project, and our ongoing physical presence in the community of Coral Bay, as well as our organization’s interest in protecting and preserving the history, culture and natural resources of Coral Harbor, we are formally requesting that Save Coral Bay Inc. be recognized as a Consulting Party under 36 CFR § 800.2(c)(5). Our ability to “network” with native St Johnians, long term residents, maritime experts, historical scholars and others with the ability to add to the understanding of the significance of this discovery is, we believe, unparalleled and will be a valuable asset to the Section 106 review process.



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The implementing regulations regarding participants in the Section 106 process of the National Historic Preservation Act are found in 36 CFR § 800.2(c)(5). They state that “certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.” Save Coral Bay believes that our ongoing involvement in the undertaking, and our deep concern for the effects of the undertaking on historic sites, including currently undocumented but known shipwrecks in the area, clearly qualifies Save Coral Bay for involvement as a consulting party.

Additionally, Save Coral Bay has been legally involved in the marina undertaking with the assistance of our counsel Attorney Robert Fox, of Manko, Gold, Katcher and Fox. Attorney Fox represents a group of Coral Bay individuals and organizations who are deeply concerned about the impacts of the project, including its impacts on environmental, cultural, economic and historic resources in Coral Harbor. Our members have publicly expressed concerns regarding the adverse economic impacts of the undertaking, including its potential to undermine federal and local investments in storm water management throughout the Coral Bay watershed.

Over the years Save Coral Bay has demonstrated its commitment to protection of the natural resources of Coral Bay. A natural extension of that commitment is for us now to be expressing our concern with the proposed undertaking's effects on historic properties. It is for this reason that we are requesting to be recognized as a Consulting Party in the Section 106 NHPA process so that we can lend our assistance to this important review.

With kind regards,



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cc: Mr. Robb Fox, Esq., Manko Gold Katcher and Fox
Mrs. Sharon Coldren, President, Coral Bay Community Council

Ms. Karen Urelius, Team Lead, Antilles Office, USACE
Ms. Carolyn Farmer, Project Manager, USACE
Mr. Sean Krigger, VISHPO

Mr. Jaime Loichinger, Assistant Director, Advisory Council on Historic Preservation