



St. Croix Environmental Association

A Chapter of the Virgin Islands Conservation Society

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To: Janice Hodge, Director of CZM
 Department of Planning and Natural Resources
 No. 45 Estate Mars Hill
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From: Paul Chakroff
 Managing Director, SEA

Subject: Review of Major CZM Permit No. CZX-40-07L/567 SGB, LLC
 Application by 567 SGB, LLC for renovation of the Grapetree Bay Hotel
 Estate Grapetree Bay, St. Croix, USVI

The St. Croix Environmental Association (SEA) recommends approval of the proposed project with the following conditions:

1. Expansion of the EAR to include potential environmental impacts and mitigation plans for all construction as well as post-construction (operation and maintenance) phases of the proposed project.
2. Development of a sea turtle lighting and mitigation plan acceptable to DPNR Division of Fish and Wildlife that covers construction and operation phases of the project; such plan should include monitoring for sea turtle activity as well as any sand migration on Grapetree Bay beaches.
3. Submission of a complete list of existing and proposed plant species to be used in landscaping;
4. Development and submission of a relocation and mitigation plan acceptable to DPNR Division of Fish and Wildlife for bats;
5. Any proposed major beach renourishment or breakwater project would require additional evaluation and review; Introduced sand would have to be the same grain size, content, and consistency as the western end of the bay.
6. Submission of detailed baseline map of existing living *Acropora spp.* dead coral skeleton, and natural consolidated hardbottom in Grapetree Bay; and an *Acropora* protection and mitigation plan acceptable to DPNR Division of Fish and Wildlife that covers construction and operation phases of the project.

SEA generally supports the renovation of hurricane-damaged structures on St. Croix as a means of providing socioeconomic and public welfare benefits to the island, while minimizing impacts on critical undisturbed natural habitats. SEA is particularly supportive of the renovation of the Grapetree Bay Hotel, and we agree with the assertion under Environmental Assessment Report (EAR) Section 9.00 ALTERNATIVES TO PROPOSED ACTION that the renovation is *the least environmentally impacting* of the alternatives considered.

The EAR lacks specificity in discussion of mitigation of impacts, especially related to introduction of landscape plant species and potential impacts on Federally-listed threatened and endangered sea turtles, Federally-listed threatened coral species and Territorially endangered bat species.

EAR Section 3.00 ABSTRACT

According to the abstract, *SGB, LLC is seeking approval of the overall plan*. However, the statement that *(i)t is the applicant's intention to submit these plans at a future date and request approval for those plans at that time*(Ref. RESPONSE TO CHECKLIST OF DEFICIENCIES deficiency #2), and superficial coverage of issues like bat relocation, and beach renourishment indicate that this EAR addresses only the first construction phase of the project. SEA has consistently taken the position that EARs should cover all phases of proposed projects, and potential environmental impacts should not be considered phase by phase.

EAR Section 6.07 TERRESTRIAL RESOURCES

According to the EAR (p. 74): *The area has been colonized by invasive species and casha bush (Acacia tortuosa), tan tan (Luecaena luecocephala) and manchineel (Hippomane manchinella) are common growing in planting beds and along side walks* In the response to Deficiency No. 2, the applicant states: *The landscape plan has been provided on Drawings L-1, L-2 and L-3. The plan envisions the removal of the invasive species (tan-tan, casha, white manjack, manchineel, guinea grass) from the planters and restoration of the existing mature landscape species which remain....*

We applaud the removal of invasive species listed in the EAR, SEA did not find Drawings L-1, L-2 and L-3 attached, and would like to review the *existing mature landscape species which remain* to ensure that none of these are invasive exotic species. SEA encourages use of indigenous plants for new plantings, while retaining established exotic examples so long as they are prevented from encroaching on habitat beyond the hotel bounds. Note also that white manjack and manchineel are USVI natives: from a botanical perspective, SEA does not see it as appropriate to include them in the list of exotic species to be removed.

EAR Section 6.09 RARE AND ENDANGERED SPECIES

The EAR asserts that *due to the condition of the shoreline the beach is not a turtle nesting beach* (p75). In response to Deficiency No. 6, the applicant asserted: *The project area does not have any shoreline areas suitable for turtle nesting.*

Green and hawksbill nesting has been recorded on beaches immediately west of the Grapetree Bay Hotel property (Figure 1)



2007 Sea Turtle Nesting Activity in Grapetree Bay and Jack Bay, St. Croix, USVI
Source: West Indies Marine Animal Research and Conservation Society, Inc. (WIMARCS)

Given the prevailing westerly current, erosion from construction and proposed beach rejuvenation would have potential impact on turtle nesting activity. SEA therefore concurs with the CZM staff recommendation that “the applicant needs to provide a turtle lighting and mitigation measures to protect against interactions between turtles and proposed renovation activities.” SEA recommends that the turtle lighting and mitigation plan be expanded to include protection of interactions after the completion of renovation, i.e. during maintenance and operation of the new facilities.

Over time, runoff from the parking areas will find its way to the sea and consequently west to the turtle nesting areas at the west end of the bay. Permeable paving is recommended to minimize runoff and consequent migration of petroleum products and combustion byproducts to active sea turtle nesting areas.

Again in response to Deficiency No. 6, the applicant states that they *would like to place appropriate sand immediately in front of the beach side units ... re-contour the piled cobbles in front of the buildings and place appropriate quality sand. And: The only excavation proposed is... re-profiling of the shoreline which is cobble.*

SEA would need clarification of this statement to assess the potential impacts of this beach restoration effort on nesting turtles as well as the near-shore marine environment.

In further response to Deficiency No. 6, the applicant states: *The two largest Acropora palmata colonies are indicated on the map below, the new recruits have not been mapped.*

Federally listed *Acropora spp.* and *Acropora* habitat should be accurately mapped prior to construction to provide baseline data for monitoring the species during and after construction. Bathymetric maps should include and distinguish existing living *Acropora spp.*, dead coral skeletons, and natural consolidated hardbottom in Grapetree Bay. SEA is particularly concerned about possible impacts on *Acropora spp.* from erosion during construction, and suspended solids that may result from proposed beach rejuvenation, and runoff from parking lots during major storm events.

In response to Deficiency No. 8, the applicant states: *Three species of bats, Artibeus jamaicensis, Brachyphylla cavernarum and the fishing bat Noctilio leporinus have been noted within the buildings over the last several months.*

Two of the three bat species, *Noctilio leporinus* and *Brachyphylla cavernarum*, are listed as Territorially Endangered by DPNR, Division of Fish and Wildlife. SEA agrees with the CZM staff recommendation that “a mitigation plan which addresses displacement of bats ... must be provided.”

EAR Sec. 7.03D ELECTRICITY

The applicant states that they are *looking into utilizing wind power to further reduce dependence on WAPA*. SEA encourages use of alternative energy sources, including wind and solar. A more complete explanation of the applicants wind generation plan should be provided, and should include discussion of location, capacity, environmental impacts on birds and bats. If this is a serious inquiry into alternative power, these factors should be addressed substantively, as should other alternative energy options.

Thank you for the opportunity to submit comments on the Environmental Assessment Report for the renovation of the former Grapetree Bay Hotel, Estate South Grapetree Bay, St. Croix, USVI.

Respectfully Submitted,

Paul Chakroff
Managing Director