



St. Croix Environmental Association

A Chapter of the Virgin Islands Conservation Society

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Attn: Michael Sisco, Managing Editor

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Letter to the editor:

The Avis usually gets their facts straight, but they got one wrong in Friday's story on the William & Punch CZM public hearing when they wrote that "The St. Croix Environmental Association, which has opposed all development projects in the last several years, said...."

This statement is simply not true. The St. Croix Environmental Association (SEA) actively supported and contributed substantively to the design of a proposed development at The Palms at Pelican Cove, a beach-side development project with potential impacts on sea turtle nesting that received approval of its major CZM permit August 19, 2008. Also, on February 13, 2008, SEA recommended for approval with conditions of the CZM permit for the renovation project at Grapetree Bay Hotel. The CZM Commission approved Grapetree's major CZM permit application with conditions consistent with those recommended by SEA.

More important, SEA is not opposed to a major development project at the William & Punch site, and SEA believes that its concerns with the William & Punch Environmental Assessment Report (EAR) can be addressed. Our concerns relate primarily to the adequacy of the EAR and appended documents as currently submitted to CZM to meet mandates of territorial and federal environmental law.

Insisting on a responsive EAR and other components of the CZM application is key, because it is the CZM record and the conditions associated with the CZM permit that will provide the basis for holding the developers (and their successors) accountable for their commitments to environmentally sound and sustainable development. Three years from now when construction is underway, assurances from a public presentation may be forgotten, and vague promises in the EAR may not be enforceable. Now – before the permit is issued – is the time to define those commitments in detail and memorialize them in the written conditions of the CZM permit. That is the purpose and thrust of SEA's comments.

In summary, SEA finds not against the William & Punch project – but against the sufficiency of the EAR. There is no reason why EAR shortcomings cannot be corrected within William & Punch's timeframe. Had we been permitted to offer our full oral testimony last night, the Commissioners, the William & Punch team and the public would have heard our closing statement that SEA would welcome the opportunity to work with William & Punch on completing the mandated requirements for future CZM Commission review.



Paul Chakroff
SEA Managing Director