



St. Croix Environmental Association

*To promote conservation of environmental resources, provide education,
and advocate for environmentally responsible actions.*

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William and Punch, LLP
and
Mashantucket Pequot Tribe
2 Matt's Path
P.O. Box 3060
Mashantucket, CT 06338

Greetings,

We'd like to thank you for your presentation of the update to the site plan and for introducing us to some of the principals from the Mashantucket Pequot tribe who will be involved in the project. We were encouraged when we heard about the involvement of the Mashantucket Pequot tribe in the William & Punch project for two reasons; assurance of a sound financial backing and, just as important, the great tradition of respect and deep spiritual commitment of Native Americans to the land and its preservation.

Appropriate development and sensitive use of the W&P property could become a model for future projects on St. Croix, as well as setting the tone for mutually beneficial relationships with future developers.

As we spoke about your latest iteration of the plan, some of the items we discussed raised questions for which we would like further elucidation. Realizing that W&P is still a work in progress, we offer the following in the hope that the early expression of SEA's concerns could be of benefit in the formulation and assurance of success of your upcoming permitting and approval process.

The Wetland

1. In light of the bermed roadbeds surrounding the wetland, what provisions for water management have been, or will be, established? Some wetland species require an annual cycle of flooding and drying out, while others require stable water levels with varying salinity. Please spell out how your proposed management of surface and groundwater hydrology will impact the ecology of wetlands in the project's watershed. Monitoring and reporting regimens also should be included in your management plan.
2. What construction setback from the wetland margin will be honored? SEA has taken a position that buffer zones should be established depending on the level of adjacent human activity, in addition to margins that ensure and maintain the well being of the wetland flora and fauna and that of the surroundings.

The Golf Course

Golf courses present many challenges to developers and environmentalists. Before noting specific areas of concern, we'd like to refer you to Audubon International's Cooperative Sanctuary Program (ACSP) for Golf Courses, and encourage you to participate in their excellent program. Your course designer will undoubtedly be familiar with the details of Audubon International's program, which offers ACSP Gold Course Certification for courses that implement environmental management practices in areas of: (See www.audubonintl.org/programs/acss/golf.htm.)

1. Environmental planning.
2. Wildlife and habitat management.



3. Chemical use reduction and safety.
4. Water conservation.
5. Water quality management
6. Outreach and education.

In addition to the Audubon areas above, we have special interest in large trees and native plants. Please identify management practices related to protection of notable specimens as features, and the use of native species in landscaping.

The Marina

1. We are pleased to note that you will be adhering to established imperatives and guidelines for attaining the designation of "Blue Flag" for the marina.
2. SEA would like to know more about, and receive updates on, the ocean current, sand migration, and other marine studies regarding the jetties and their expected benefits and maintenance procedures, including dredging and disposal of dredge products, how this affects your beach nourishment plans, and how it may affect the beaches and near-shore marine environment north and south of the development (see Beach below).

The Beach

With its importance for the nesting of sea turtles, various factors will be critical in complying with both Federal and Territorial law and local custom.

1. Please keep us updated on the beach nourishment plans and proposed schedules, as they are most important in maintaining the area as a viable nesting site.
2. We had little discussion about the correct method for lighting the beach, but this will be a major contributor to the preservation of the beaches as a safe turtle nesting site.

Self-sustenance and dependence upon existing island infrastructure

St. Croix's infrastructure at all levels is sorely burdened and the reliable delivery of services is an issue residents and businesses contend with on a daily basis.

1. Please further explain your decision to tie into the existing WAPA water supply. WAPA's potable water production is energy intensive. Wouldn't the use of rainwater reduce the need for WAPA-produced water? How will WAPA deal with the added volume W&P will require, given that there are difficulties meeting the current demand both in quantity and reliability? Even with the recent upgrade, WAPA's capacity is questionable.
2. We are concerned about the tie-in to the WMA sewage transport system at Lagoon in Frederiksted. This is an area of recurrent problems that has not been sufficiently addressed by V.I. government agencies to ensure fail-safe delivery downstream to the sewage treatment plant at Anguilla, and avoid the pooling of untreated sewage at Lagoon and outflow to the sea.
3. The current site plan has not located nor described the water storage and pumping facilities meant to gravity-feed to the project.
4. Where does the run-off from roofs and parking areas inside the ring road go? We were pleased to hear of the proposed use of "oases" of vegetation for run-off from parking lots and paved areas. Catchment by the large roof areas also needs to be dealt with. We also suggested employing permeable paving as an alternative where grade or other considerations prevented the channeling of water to designated "oases."

"Green" building, construction, and maintenance

1. The subject of "green" building practices came up at our meeting, but no definitive response was made.

- a. Has the use of solar and wind power been investigated? Will you establish covenants and restrictions for private owners of property and residences which mandate or suggest "green" solutions regarding energy and water conservation, as well as the use of native species for landscaping?
- b. Will "gray water" be re-used for vegetation and golf course maintenance?
- c. Will construction materials conform to any established code of "green" building? Has any provision been made for the disposal of construction waste other than the Anguilla dump?
- d. Have provisions been made for reducing the need for air conditioning through natural ventilation, evaporation, or other less energy-intensive solutions?
- e. General outdoor lighting for the project is a concern for both wildlife and people, and the security of both. What measures will be employed to reduce light pollution toward the sea, neighbors, and the sky? See www.maltastro.org/lpag/index.htm , and www.uacnj.org/LP/litepol4.htm.
- f. We refer you to the U.S. Green Building Council site: www.usgbc.org.

Remediation of errors, omissions, and unforeseen events

1. Have you arranged for a bond or insurance policy that would cover the remediation of any part of the project that didn't work out as well as you had hoped? Despite the best consultants and engineers, when dealing with the sea and St. Croix's periodic "weather events," things can go awry.

We would like to receive from you copies of the current terrestrial resources, marine resources, and hydrology studies, and any future updates to them which you have commissioned, in advance of their submission as part of your permitting process.

We offer our assistance in locating and designating notable specimen trees for conservation, and would like your permission to walk the property to do so.

We would like to examine the wetland to help determine what type of management strategy could be employed, possibly combining the monitoring function with an educational component for your guests, students, St. Croix residents, and tourists.

We also want to offer you our assistance and expertise regarding environmental issues or concerns that arise before or during your application process, as well as during the construction and management of the property.

Thanks for your ongoing efforts in keeping us informed. We look forward to your regular updates and the receipt of your technical data.


Sincerely,



Michael Baron, SEA Board Member, Advocacy Committee



Paul Chakroff, SEA Managing Director



Donald Diddams, SEA Board Chairman