

APPENDIX C

Public and Agency Project Comments and Corps' Responses

Environmental Assessment Savan Gut, St. Thomas, United States Virgin Islands (USVI) Continuing Authorities Program (CAP) Conversion Feasibility Report



**US Army Corps of Engineers
JACKSONVILLE DISTRICT**

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Table 1. Summary of Corps' responses to comments received during the agency and public review and comment period for the draft Environmental Assessment (EA) for the Savan Gut project in St. Thomas, United States Virgin Islands (USVI).

Comment Number	Commenter	Summary of Comment	Corps' Response
1	Olivia Diana	There is a lack of sediment controls proposed even though temporary sediment increases will occur. Although sediment amount will be low there can be an effect of sedimentation on the harbor. There can also be accidents that will cause large amounts of sediment to go into the harbor. To prevent large impact of these accidents having a sediment barrier in place before the accident occurs will minimize impacts.	<p>Thank you for your comments. Current conditions are causing both erosion and sediment build up in various sections of the channel. This project's velocity check dam will help contain sediments from reaching the bay. Additionally, Best Management Practices (BMPs) (e.g. silt fences) will be implemented for erosion control and to contain sediments during construction. Following construction, any disturbed sediment will be re-vegetated to natural conditions.</p> <p>The Corps commits to meet all applicable water quality standards in order to minimize adverse impacts to water quality. Implementation of design and procedural controls will prevent oil, fuel, or other hazardous substances from entering the air or water and reduce turbidity impacts. The Corps will coordinate water quality monitoring requirements with the USVI DPNR and will implement monitoring as prescribed by the project's permits (e.g. turbidity monitoring during discharge events). The Corps will obtain all required permits and authorizations prior to the start of construction.</p>
2	Olivia Diana	There will also be a considerable impact in traffic as Charlotte Amalie is a high traffic area. Having an effect plan for traffic will reduce these impacts.	The Corps requires Contractors to submit a traffic control plan to address potential effects, changes, closures, etc. during the construction of the project.
3	Piotr Gajewski, St. Thomas resident	I strongly support this project to reduce flood damages to the Jane E. Tuitt Elementary School and Central Business District in downtown Charlotte Amalie.	Thank you for your comments and support of the project.

Comment Number	Commenter	Summary of Comment	Corps' Response
4	Piotr Gajewski, St. Thomas resident	This area lacks the infrastructure to support the transportation needs of the community. This project is an opportunity to enhance the walkability of the community. What considerations are being made with regard to pedestrian, recreational, transit enhancements, and ADA accessibility as part of this project?	Thank you for providing the information from the United States Virgin Islands (USVI) Walkability Institute. The project includes offsetting impacts to existing recreation and cultural resources. This recommendation was provided to the Corps' team for consideration during the Preconstruction Engineering Design (PED) phase when the project's design will be reviewed and refined.
5	Naomi Huntley, Masters Student at the University of the Virgin Islands (UVI)	The report states that if a mitigation plan is needed, it will be developed later. It would be more effective to have a mitigation plan in place before something happens, and to change the plan as needed.	Thank you for your comments. While portions of the Recommended Plan may affect wetlands, the project design avoids and minimizes destruction, loss, and/or degradation of wetlands. In addition, the design preserves and enhances the natural and beneficial values of wetlands. The Corps has estimated up to one acre of the project footprint may affect wetlands but does not feel mitigation is required as wetlands have been avoided to the extent practicable and the final design will minimize any additional impact. Further BMPs during construction will be employed and the recommended project will not have more than negligible impacts on ecological resources. Native vegetation is expected to recolonize the project area quickly due to a year round growing season.
6	Naomi Huntley, Masters Student at the UVI	Has any recent monitoring been done at the wetland area? Will monitoring occur during and after construction?	The Corps has not conducted recent monitoring at the wetland area; however, Corps' staff have completed periodic site visits to the project area since October 2017 through as recent as September 2019. The Corps will coordinate water quality monitoring requirements with the USVI DPNR and will implement monitoring as prescribed by the project's permits (e.g. turbidity monitoring during discharge events).

Comment Number	Commenter	Summary of Comment	Corps' Response
7	Naomi Huntley, Masters Student at the UVI	Has any monitoring been done to determine if there are pollutants, such as heavy metals, that will be disturbed during construction that could end up in the wetland area? If there are pollutants, how can these be dealt with to minimize their spread to surrounding habitats?	A review of potential HTRW sources was conducted during the development of the 2020 Savan Gut EA (see Section 3.2). However, the Corps may conduct an additional HTRW assessment in accordance to the Engineering Regulation (ER) 1165-2-132 during the project's PED phase.
8	Naomi Huntley, Masters Student at the UVI	How will vegetation be replanted? (ie. Will current vegetation be transplanted, or new seeds planted?) Are there examples of the method used being successful? Will there be monitoring of the replanted vegetation to determine if replantation was successful?	At this time, it is not expected that vegetation will be replanted. Native vegetation is expected to recolonize the project area quickly due to a year round growing season.
9	Naomi Huntley, Masters Student at the UVI	Will fish and wildlife populations be monitored to determine if they return to normal and how long it takes for that to occur? If the fish and wildlife populations do not naturally rebound, what is the mitigation plan to help deal with this?	Fish and wildlife populations will not be monitored. Effects to fish and wildlife are discussed in Section 4 of the final EA.

Comment Number	Commenter	Summary of Comment	Corps' Response
10	Naomi Huntley, Masters Student at the UVI	Will water quality be monitored before, during, and after the project? How will the design and procedural controls (mentioned in table 4) prevent oil and fuel from entering the air and water? How will turbidity impacts be reduced? What specifically is the spill contingency plan that will be implemented in the event of a spill?	The Corps will coordinate water quality monitoring requirements with the USVI DPNR and will implement monitoring as prescribed by the project's permits (e.g. turbidity monitoring during discharge events). The Corps will obtain all required permits and authorizations prior to the start of construction. The Corps requires contractors to submit an Environmental Protection Plan (EPP) describing how the contractor will comply with laws, regulations, and permits concerning environmental protection, pollution control, and abatement that are applicable to the Contractor's proposed operations and the requirements imposed by those laws, regulations, and permits. The EPP includes descriptions of the protective measures for species that require specific attention, methods for protection of features (e.g. vegetation, animals, water) to be preserved within authorized work areas, and procedures to be implemented that will provide the required environmental protection to comply with applicable laws and regulations.
11	Amanda Long, Masters Student at UVI	The EA does not mention any monitoring.	Thank you for your comments. The Corps will coordinate water quality monitoring requirements with the USVI DPNR and will implement monitoring as prescribed by the project's permits (e.g. turbidity monitoring during discharge events)..
12	Amanda Long, Masters Student at the UVI	Digging up sediment along a gut could potentially bring harmful metals or toxins into any water flowing into the gut.	A review of potential HTRW sources was conducted during the development of the 2020 Savan Gut EA (see Section 3.2). However, the Corps may conduct an additional HTRW assessment in accordance to the Engineering Regulation (ER) 1165-2-132 during the project's PED phase.
13	Amanda Long, Masters Student at the UVI	For the proposed parks, will native vegetation be used? Will the landscaping in the proposed parks be environmentally friendly, especially for native wildlife potentially disturbed during this project?	Native vegetation will be replanted and environmentally friendly features will be considered. Landscaping details will be finalized in PED once the locations of the proposed parks have been determined.

Comment Number	Commenter	Summary of Comment	Corps' Response
14	Amanda Long, Masters Student at the UVI	If there are wetlands in the impacted area, in what ways does the project design help minimize disturbance to the wetlands?	The project design minimizes destruction, loss, and/or degradation of wetlands. In addition, the design preserves and enhances the natural and beneficial values of wetlands. Native vegetation is expected to recolonize the project area quickly due to a year round growing season..
15	Sonora Meiling, Masters Student at the UVI	It is unlikely that there is a wetland at such high of an elevation surrounded by steep slopes.	Thank you for your comments. While portions of the Recommended Plan may affect wetlands, the project design avoids and minimizes destruction, loss, and/or degradation of wetlands. In addition, the design preserves and enhances the natural and beneficial values of wetlands.
16	Sonora Meiling, Masters Student at the UVI	Is there a reason that the environmental surveys aren't being reconducted, but the cultural surveys are?	The Corps intends to conduct an updated H&H model, using the latest available data, during the project's PED phase to refine project design. In order to meet current Federal, state, and local laws, regulations, and policy, as well as Corps standards and guidelines, the Recommended Plan will be reviewed and refined during the PED phase.
17	Sonora Meiling, Masters Student at the UVI	I don't see how increasing channelization will "enhance the natural and beneficial values of wetlands."	The project design preserves and enhances the natural and beneficial values of wetlands. Native vegetation is expected to recolonize the project area quickly due to a year round growing season..
18	Sonora Meiling, Masters Student at the UVI	Is there a reason the installation of sediment barriers wasn't highlighted?	The Corps requires Contractors to submit an EPP describing the BMPs (e.g. sediment barriers) that will be implemented for erosion control and to contain sediments during construction. The Corps does not typically dictate the methods to be used, which allows for traditional BMPs as well as innovative solutions to be submitted in the Contractor's EPP, which is reviewed and approved by the Corps.
19	Sonora Meiling, Masters Student at the UVI	Page 21 mentions that there will be no changes in land use, but controversially also describes the building of new and wider channels.	The existing channel, which contains both the natural gut and concrete portions, is located in a highly urbanized area and would not result in a land use change. For a majority of the project, the proposed channel will be located in the same footprint as the existing channel but will be expanded to handle more flow capacity. A deviation from the existing footprint will occur around the Jane E. Tuitt Elementary School to reduce life safety risks at the school.

Comment Number	Commenter	Summary of Comment	Corps' Response
20	Sonora Meiling, Masters Student at the UVI	Water quality should be managed throughout the construction and implementation of this plan to ensure adequate water quality.	The Corps will coordinate water quality monitoring requirements with the USVI DPNR and will implement monitoring as prescribed by the project's permits (e.g. turbidity monitoring during discharge events). BMPs (e.g. sediment barriers) that will be implemented for erosion control and to contain sediments during construction. Following construction, any disturbed sediment will be re-vegetated to natural conditions.
21	Sonora Meiling, Masters Student at the UVI	This section mentions "lethally" removing plants during construction, I fail to understand how this isn't an environmental impact as suggested by the beginning of this document ("no environmental impact").	Vegetation will be removed as required for the construction. Following construction, any disturbed sediment will be re-vegetated to natural conditions.
22	Sonora Meiling, Masters Student at the UVI	Where will hazardous materials be properly disposed? Off island? I fail to see how this project has no environmental impact.	A review of potential HTRW sources was conducted during the development of the 2020 Savan Gut EA (see Section 3.2). However, the Corps may conduct an additional HTRW assessment in accordance to the Engineering Regulation (ER) 1165-2-132 during the project's PED phase.
23	Sonora Meiling, Masters Student at the UVI	How will this construction not affect the tree boa, if present, if the vegetation is going to be "lethally" removed due to construction?	Effects to listed species have been coordinated with USFWS and are described in section 4 of the EA. Coordination documents can be found in Appendix A of the EA.
24	Mele, Dan	The report mentions there are multiple hazardous waste sources (gas stations, dry cleaners, etc.) within the project site, but doesn't mention any ways to control for the release of contaminants from these sites. It only mentions that they are present.	Thank you for your comments. Control for the release of contaminants from the existing hazardous waste sources (e.g. gas stations, dry cleaners, etc.) is beyond the scope of this project. In addition to the review of potential HTRW sources that was conducted during the development of the EA (see Section 3.2), the Corps may also conduct an additional HTRW assessment in accordance with the guidelines provided in ER 1165-2-132 during the project's PED phase.
25	Mele, Dan	How will climate change be including in the project plan?	Sea level rise due to climate change is discussed in the 2020 Savan Gut, St. Thomas, USVI CAP Conversion Feasibility Report, which is included in the EA's Appendix E.

Comment Number	Commenter	Summary of Comment	Corps' Response
26	Mele, Dan	What will happen to Virgin Island tree boas if they are found in the project zone?	The Corps will implement the USFWS' Virgin Island tree boa standard protection measures, which are included in Appendix A of the final EA, to protect any individuals that may occur in the area.
27	Renata Platenberg, Ph.D., Assistant Professor of Natural Resource Management at the UVI	While a debris trap might be helpful in reducing the movement of trash and debris, considerations should be made toward improving connectivity for wildlife while reducing contaminant input and flow.	Thank you for your comments. This recommendation was provided to the Corps team for consideration during the PED phase when the project's design is reviewed and refined.
28	Renata Platenberg, Ph.D., Assistant Professor of Natural Resource Management at the UVI	There are considerable historic resources within the Savan area that are likely to be affected by this project.	The Corps executed a Programmatic Agreement (PA) with USVI State Historic Preservation Officer on October 30, 2019. The PA outlines the process in which the Corps will consult with historic agencies to avoid, minimize, and mitigate adverse effects to historic properties and resources.
29	Renata Platenberg, Ph.D., Assistant Professor of Natural Resource Management at the UVI	Many of the local residents are non-English speakers. Stakeholder involvement that utilizes local community leaders is critical to the success of this project.	A public outreach meeting was held on April 2, 2019 at the Bethania Hall in Frederik Evangelical Lutheran Church in St. Thomas for the project. The Corps intends to conduct additional public meetings to present and discuss the project's status and design as well as provide the opportunity for public participation. These meetings will be held during the project's PED phase.
30	Robles, Carlos	Infrastructure be incorporated into both projects that would allow for the active general public (walkers, hikers, joggers, trail bikers etc. have access to and through these projects for recreational and educational projects. The Savan Gut Project should include hiking trails for ecological education exploration and other environmental eco-related opportunities.	Thank you for your comments. This project's recreation features are discussed in section 4 of the EA. The project includes offsetting impacts to existing recreation and cultural resources. This recommendation was provided to the Corps' team for consideration during the PED phase when the project's design will be reviewed and refined.

Comment Number	Commenter	Summary of Comment	Corps' Response
31	Robles, Carlos	Two additional projects that are worthy of consideration Magen's Bay Watershed which is on the north side and Route 318 the Estate Bordeaux Road.	Thank you for your comments. A recommendation should be submitted to your local constituent.
32	Ross, Desiree	Walkability should be included in the project.	Thank you for your comments. This project's recreation features are discussed in section 4 of the EA. The project includes offsetting impacts to existing recreation and cultural resources. This recommendation was provided to the Corps' team for consideration during the PED phase when the project's design will be reviewed and refined.
33	Winkfield, Alma	We are requesting inclusion of pedestrian needs, on behalf of the people who live near or in major gut project areas slated for construction. Are there any plans to include multi-use pathways, bike trails/lanes, approved sidewalks and/or transit needs such as bus access to the above-mentioned projects? It is our suggestion that if these needs have not been included, that they be evaluated and implemented into the proposed plans	Thank you for your comments. This project's recreation features are discussed in section 4 of the EA. The project includes offsetting impacts to existing recreation and cultural resources. This recommendation was provided to the Corps' team for consideration during the PED phase when the project's design will be reviewed and refined.

From: [Olivia Diana](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Comments on the Turpentine Run and Savan Gut Phase II
Date: Saturday, April 20, 2019 11:37:57 PM
Attachments: [Comments to ACoE .docx](#)

Good Evening,
Attached are my comments for the Turpentine Run and Savan Gut Phase II projects.
Thank you,
Olivia Diana

Comments for the Draft Environmental Assessment (EA) for Turpentine Run and Savan Gut Phase II Section 205 Continuing Authorities Program (CAP) Conversion project in Charlotte Amalie, St Thomas, U.S. Virgin Islands.

A report to U.S. Army Corps of Engineers

By: Olivia Diana

Turpentine Run Project:

I am concerned with the heavy metal contamination that is potentially flowing into the mangroves from turpentine run. The thesis titled An investigation into the temporal and spatial trends of contaminants in Mangrove Lagoon, St. Thomas East End Reserves (STEER), U.S. Virgin Islands by P. Owen Clower showed that the contamination of the mangrove and lagoon had several potential sources including Turpentine Run and the horse track among other areas associated with gut. Any changes in the flow of Turpentine Run could affect the contamination into the mangroves.

There is also a lack of sediment proposed even though temporary sediment increases will occur. The use of a sediment barrier will be needed to have less effect on the mangrove lagoons. Even a temporary increase no matter how short will have negative effects on the wildlife. This needs to be taken into account better for this project. I find it quite hard to believe that the project will have low enough effects on wildlife that includes the removal of some vegetation and the added sedimentation of the watershed to warrant a FONSI.

Savan Gut Phase II:

There is a similar issue with sediments entering the gut thus entering the harbor. Though sediment will be low there can be an effect of sedimentation on the harbor. Also as seen in the water main break during an island wide power outage this April, there can be accidents that will cause large amounts of sediment into the harbor. This incident occurred while no construction or disturbance was happening at the water main. This type of accident is more likely to occur when there is construction. To prevent large impact of these accident having a sediment barrier in place before the accident occurs will minimize impact. It's hard to say that there will be little effect when there has been major accidents in the area without the projects in place.

There will also be a considerable impact in traffic as Charlotte Amalie is a high traffic area. This needs to be accounted for to minimize effect on locals and tourists as this could cause large back ups and detours affecting traffic patterns. Having an effect plan for traffic will reduce these impacts.

From: [Piotr Gajewski](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Savan Gut Phase II
Date: Saturday, April 20, 2019 3:59:30 PM
Attachments: [Benefits of Incorporating Walkability into the Project ACorps Eng.docx](#)

Good afternoon Ms. Donofrio,

As a concerned resident of St Thomas and a member of the USVI Walkability Institute I submit the following comments and concerns regarding the Savan Gut Phase II project:

* I strongly support this project to reduce flood damages to the Jane E. Tuitt Elementary School and Central Business District in downtown Charlotte Amalie.

* Being located in a historic district with narrow streets, this area lacks the infrastructure to support the transportation needs of the community. The Savan neighborhood is primarily composed of low income residents that rely on active transportation. This project is an opportunity to enhance the walkability of the community.

* Please let me know what considerations are being made with regard to pedestrian, recreational, transit enhancements, and ADA accessibility as part of this project.

As part of my comment, I am including this attached message from the USVI Walkability Institute on the benefits of walkability enhancements.

Thank you,

Piotr Gajewski

<Blocked<http://dpw.vi.gov/>>

Benefits of Incorporating Walkability into the Project

As a participant with the USVI Walkability Institute, I wanted to share with you key points as to why walkability should be included in the two projects by the Army Corps of Engineers; the Turpentine Run and the Savan Gut projects.

Incorporating walkable and biking pathways into the territory's infrastructure projects will help to encourage physical activity and this in turn will help to keep our population more healthy. This will ultimately lead to a better management of the individuals chronic disease and lead to a reduction in the prevalence of chronic diseases such as heart disease.

Per the article at the local *St. Croix Source's* website <https://stcroixsource.com/2019/04/15/health-system-staggering-swaying-yet-still-standing/>

- 30% of USVI residents are without insurance coverage
- 22% of USVI residents live below the poverty level
- Median Household income in the US Virgin Islands is \$37, 254.00
- 61% of children age 10-19 years residing in the US Virgin Islands are uninsured
- 55% of children under the age of 9 are under Medicaid
- Prior to the 2017 hurricanes, the USVI population was known to have high incidences of cardiovascular diseases, hypertension, diabetes, cancer and an underlying condition of obesity

It is documented that poverty and poor health are intricately linked. Incorporating walkability into a community will assist to decrease the number of individuals unable to seek professional medical services by increasing physical activity. Walking is an excellent way to become physically active and improve one's health.

Walkability may reduce those numbers above by

- Improving the quality of life
- Incorporate a Healthy Design Principle
- Create an easy access to critical goods and services during natural disasters
- Decrease the number of motor vehicular, bike and pedestrian accidents
- Reduce dependency on motor vehicles
- Prevent school violence (Crime Prevention through Environmental Design)
<https://www.cdc.gov/violenceprevention/youthviolence/cpted.html>
-

The Centers for Disease Control and Prevention (CDC) has provided information on walkable communities at the following link: <https://www.cdc.gov/features/walk-friendly-communities/index.html>

As mentioned earlier, to learn more about the activities at the USVI Walkability Institute, please reference the following link: <https://islandcustom2014.wixsite.com/2017usviworkshop/post-workshop>

From: [Amanda Long](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Turpentine Run/Savan Gut EA Draft Comments
Date: Saturday, April 20, 2019 6:21:47 PM

Good evening Ms. Donofrio,

I looked over the EA drafts for the Turpentine Run and Savan Gut projects and I have some comments to submit about them.

For both projects, the EAs say that there will be no long term effects to the water clarity due to this project. However, it does not mention any monitoring that will take place to ensure that this is true. Additionally, digging up sediment along a gut could potentially bring harmful metals or toxins into any water flowing through the gut. For the Turpentine Run project this could mean potentially introducing more toxic metals or materials to Mangrove Lagoon which we already know to be polluted, especially by the racetrack.

Additionally, for the proposed parks to be constructed around Savan Gut will native vegetation be used (pg. 20)? Will the landscaping in these parks be environmentally friendly, especially for native wildlife potentially disturbed during this project? Furthermore, wetlands are mentioned as a potentially impacted environment (pg. 17); however, I am not aware of any wetlands in that area. If there are wetlands in the impacted area, in what ways does this project design help minimize disturbance to the wetlands.

Thank you for the consideration of my comments,

Amanda Long
Masters Student
Research Assistant
Nemeth Lab
University of the Virgin Islands

From: [Meiling, Sonora S](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] St. Thomas EA comments
Date: Thursday, April 18, 2019 1:57:47 PM
Attachments: [savan gut comments.docx](#)
[Turpentine run EA comments.docx](#)

Good afternoon Kristen,

Attached are my comments for the Savan gut and Turpentine Run environmental analyses.

Thanks,
Sonora Meiling

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University of the Virgin Islands
Marine and Environmental Science
Master's Student
Brandt Lab RA

To whom it may concern,

The U.S. Army Corps of Engineers, Jacksonville District (Corps) had proposed construction of a covered channel, velocity check dam with floating debris barrier, and replacement of three highway bridges on St. Thomas, U.S. Virgin Islands. This project aims to reduce flooding and thus health and economic losses in the Charlotte Amalie Area. Following are my comments and questions on the current proposed plan.

- Pg. 8: This page mentions possible effects of construction on wetlands, however, I am not aware of any wetlands on the “northern portion of the project, which contains steep slopes.” Due to wetlands’ requirement of sustained water, I find it unlikely that there is a wetland at such high of an elevation surrounded by steep slopes.
- Pg. 11: Is there a reason that the environmental surveys aren’t being reconducted, but the cultural surveys are? I feel confident that the environmental extent and impact from humans has changed since the first survey in 1981.
- Pg. 17: The runoff from the channel will end up in the St. Thomas harbor, not a wetland. I don’t see how increasing channelization will “enhance the natural and beneficial values of wetlands.”
- Pg. 18: There is recognition for increased sedimentation during construction that will lead to decreased water quality in the harbor (due to high turbidity), however, there is no mention of a proposed action to mitigate this concern. Is there a reason the installation of sediment barriers wasn’t highlighted?
- Pg. 21: This page mentions that there will be no changes in land use, but controversially also describes the building of new and wider channels.
- Pg. 23: There are IUCN threatened species of coral in the St. Thomas harbor that may be affected by increased sedimentation and nutrient/chemical/metal runoff that need further consideration. Establishing sediment barriers as previous suggested may mitigate this problem, however, water quality should be managed throughout the construction and implementation of this plan to ensure adequate water quality.
- Pg. 25: This section mentions “lethally” removing plants during construction, I fail to understand how this isn’t an environmental impact as suggested by the beginning of this document (“no environmental impact”).
- Pg. 29: This section discusses the proper disposal of hazardous waste. Where will hazardous materials be properly disposed? Off island? Currently, our dump is at capacity and we don’t have a place on island for proper hazardous waste disposal. The Bovoni landfill is notoriously known for improper disposal of hazardous waste that has now leached into the lower mangrove lagoon and heavily contaminated the waters and inhabiting organisms. Again, I fail to see how this project has no environmental impact.
- Pg. 30: How will this construction not affect the tree boa, if present, if the vegetation is going to be “lethally” removed due to construction?

I appreciate the addressal of this concerns in advance and look forward to the revised plan.

From: [Dan Mele](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Turpentine Run / Savan Gut Phase
Date: Friday, April 19, 2019 11:45:09 AM

Good afternoon Ms. Donofrio,

I am a graduate student at the University of the Virgin Islands, and wanted to submit a few comments and questions regarding the Turpentine Run and Savan Gut Phase projects.

In relation to Turpentine Run, I have read through the draft EA and was wondering specifically which wetlands could possibly be impacted by this project. I noticed several times where the EA mentions wetlands, but doesn't specify which wetlands it's talking about. Another concern of mine is the displacement of wildlife during the construction phase. The EA mentions that wildlife will be temporarily displaced but will return after the construction. Is there any evidence to back this up as St. Thomas is already heavily developed with fragmented forests, so I'm wondering where this wildlife will be able to seal refuge and what will be left for them to return to post construction. Also what exact precautions will be carried out to protect the VI Tree Boa. The EA doesn't specify this.

In relation to the Savan Gut Phase II project, I again have read through the draft EA and have some concerns and questions. The report mentions there are multiple hazardous waste sources (gas stations, dry cleaners, etc.) within the project site, but doesn't mention any ways to control for the release of contaminants from these sites. It only mentions that they are present. The report also states that climate change was not taken into account in the 1982 report. With the intensity of rain storms being greater now, how will climate change be including in the project plan? Similar to Turpentine Run, it seems there isn't a good plan to deal with the VI Tree Boa if found. What will happen to them if they are found in the project zone? I worry that displacing them and moving them to other parts of the island will cause stress and ultimately the continued demise of this unique species.

Thank you for taking the time to read my questions and concerns. Looking forward to hearing back.

best regards,

Dan Mele

From: [Renata Platenberg](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Turpentine Run & Savan Gut project comments
Date: Saturday, April 20, 2019 6:48:41 PM
Attachments: [savan gut comments.pdf](#)
[turpentine run comments.pdf](#)

Good day Kristen,

Please find attached my comments on the two proposed projects for St. Thomas. Please let me know if you have any questions or if you require further information from me. I hope that you have received some useful feedback.

cheers,

Renata

Renata Platenberg, PhD
Assistant Professor of Natural Resource Management
College of Science and Mathematics
University of the Virgin Islands



College of Science and Math

20 April 2019

Re. Comments on Draft EA for **Savan Gut**, St. Thomas, US Virgin Islands Flood Risk Reduction CAP Conversion

To Whom it May Concern,

I wish to submit the following comments for consideration in the evaluation of the above referenced proposal.

There is an undisputed need for flood abatement in the Savan area and other locations within the Charlotte Amalie district, and this project is long overdue. However, the following considerations should be made prior to project approval.

The project area is at the base of a gut (natural stormwater drainage), characterized by gallery moist forest habitat. These rare freshwater systems provide valuable habitat for diadromous species, including freshwater fish (e.g., mountain mullet *Agonostomus monticola*), shrimp (e.g., *Macrobrachium* spp. and *Atya* spp.), and other organisms. American eels (*Anguilla rostrata*), a species of concern, can also be found in these freshwater systems. The channelization of the gut through the urban environment likely disrupted connectivity between the natural gut and the marine environment, thus preventing these species from migrating between the two habitats while allowing pollutants (trash, debris, contaminants, sediment, etc.) to flow unimpeded into the harbor. While a debris trap might be helpful in reducing the movement of trash and debris, considerations should be made toward improving connectivity for wildlife while reducing contaminant input and flow. There are likely to be engineering fixes for this situation that were not available in the 1980s when this project was initially proposed.

Additionally, there are considerable historic resources within the Savan area that are likely to be affected by this project. There is strong community pride among the long-term residents, with several community groups having pledged support for the preservation of the resources and for Savan/deJongh Gut. Many of the local residents are non-English speakers. Stakeholder involvement that utilizes local community leaders is critical to the success of this project.

Thank you for the opportunity to comment on this important project. Please let me know if I can provide further information on any of the concerns I identified.

Sincerely,

Renata Platenberg, Ph.D.

Assistant Professor of Natural Resource Management
University of the Virgin Islands

Renata.platenberg@live.uvi.edu

From: [Carlos Robles](#)
To: [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Commentary On the Turpentine Run protect
Date: Monday, April 22, 2019 8:25:32 PM
Attachments: [CR Comments on Turpentine Run and Savan gut Projects..pdf](#)

Hello Ms. Donofrio:

Please accept my apologizes for the late submission of my comments on the Turpentine Run and Savan Gut Project. With the 20th being on a weekend, i thought that that was an error only to be told by someone that it not unusual. Please consider reading it ven if it is not included din the official record.

Regards

Carlos Robles

Carlos Robles
P.O. Box 374 EGS
St. Thomas, VI 00804
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340-626-9245 (m)
c.losrobles@yahoo.com

Kristen Donofrio
U.S. Army Corps of Engineers, Planning Division – Environmental Branch,
Jacksonville District,
701 San Marco Blvd.,
Jacksonville, FL 32207,

Dear Ms. Donofrio

This correspondence serves to provide USACE with my commentary on the development of the Turpentine Run Flood Mitigation Project and Phase II of the Savan Gut Project.

I appreciate the fact that these two projects are finally becoming a reality and nearing completion. My wish for both projects is that some type of Infrastructure be incorporated into both projects that would allow for the active general public (walkers, hikers, joggers, trail bikers etc. have access to and through these projects for recreational and educational projects.

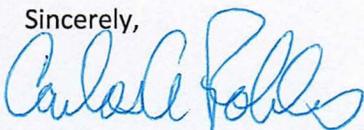
Regarding the Turpentine Run Project, if the rendering is any indication of the final outlay of the hardscape/ infrastructure, the inclusion of bike lanes, walking and jogging lanes (to rubberized jogging lane) would encourage the already growing trend of active lifestyle changes being made by Virgin Islanders.

The Savan Gut Project should include hiking trails for ecological educational exploration and other environmental eco-related opportunities. Local biological science teachers at all levels would benefit immensely from a chance to connect theory with local and culturally relevant practical examples and practical applications.

There are 2 additional projects that are worthy of consideration. The Magen's Bay Watershed which is on the north side and Route 318 the Estate Bordeaux Road at the western end of St. Thomas.

As former Commissioner of Agriculture, Territorial/State Forester and avid outdoors man, I am cognizant of the need for these quality of life enhancements to our existing and future infrastructure. Thank you for the opportunity to give my input on these two projects.

Sincerely,





A project of the St. Croix Foundation

April 10, 2019

Ms. Kristen Donofrio

Kristen.L.Donofrio@usace.army.mil

Dear Ms. Kristen Donofrio;

The VI Trail Alliance is working to improve walkability and pedestrian support infrastructure for the Territory. We are advocating for improving walking, biking and active lifestyles for all residents and visitors.

We are requesting inclusion of pedestrian needs, on behalf of the people who live near or in major gut project areas slated for construction in the Savan Gut and Turpentine Run locations. We acknowledge that there is little space available on St. Thomas that can advance pedestrian infrastructure, so this makes inclusion of pedestrian needs a critical issue for access, health and opportunity.

Are there any plans to include multi-use pathways, bike trails/lanes, approved sidewalks and/or transit needs such as bus access to the above-mentioned projects?

Guts in the territory make excellent recreational trail options due to the inability to build 30 ft on either side of a gut. This makes them true greenspaces. Pathways or trails can also facilitate access to guts for maintenance and inspection purposes.

The Virgin Islands Trail Alliance is also a member of the Walkability Institute of the VI and are aware of the decreased health condition of our residents that can be resulting in part from the inability to have safe, supported infrastructure on which to enjoy healthy lifestyles.

The best and most cost-effective time to plan, design and build pedestrian supported infrastructure is during major road or gut projects.

It is our suggestion that if these needs have not been included, that they be evaluated and implemented into the proposed plans for both Savan Gut and Turpentine Run.

We look forward to hearing from you. Thank you for your work on this project.

Sincerely,

Alma Winkfield

VP VI Trail Alliance

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Vitrials.org

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