

# **APPENDIX C**

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## **Public and Agency Project Comments and Corps' Responses**

### **Environmental Assessment**

**Turpentine Run, 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 Turpentine Run/Nadir Area project in St. Thomas, U.S. Virgin Islands (USVI).

Comment Number	Commenter	Summary of Comment	Corps' Response
1	Marvin Blyden, U.S. Virgin Islands, Senator, St. Thomas St. John Community	We need to keep the basketball court within the community and keep the playground. We need to keep our recreational facilities and green space.	Thank you for your comments. The Corps intends to offset impacts to existing recreation features (details can be found in section 4 of the Environmental Assessment (EA)). The location of the recreation features will be determined during the project's Preconstruction Engineering and Design (PED) phase.
2	Olivia Diana	I am concerned with the heavy metal contamination potentially flowing into the mangroves. The thesis (an investigation into the temporal and spatial trends of contaminants in the Mangrove Lagoon, St. Thomas) showed that the contamination of the mangrove and lagoon had several potential sources. Changes in the flow of Turpentine Run could affect the contamination into the mangroves.	Thank you for your comments. The Corps is aware of the work conducted by the University of the Virgin Islands (UVI) and National Oceanic and Atmospheric Administration (NOAA) regarding contamination in Mangrove Lagoon. During the project's PED phase, the Corps will conduct a hazardous, toxic, radioactive, and waste (HTRW) assessment. If the initial assessment indicates the potential for HTRW, further testing and analysis would be conducted during the project design to determine the path forward.
3	Olivia Diana	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.	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.
4	Olivia Diana	It is 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.	Pursuant to the National Environmental Policy Act (NEPA), the Corps has completed an agency review of this project and has determined that an Environmental Impact Statement (EIS) is not required. Effects to fish and wildlife are discussed in Section 4 of the final EA.
5	Naomi Huntley, Masters student, University of the Virgin Islands (UVI)	Has any recent monitoring been done at the wetland area? Will monitoring occur during and after construction?	Thank you for your comments. 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 U.S. Virgin Islands (USVI) Department of Planning and Natural Resources (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
6	Naomi Huntley, Masters student, 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 will they be dealt with?	During the project's PED phase, the Corps will conduct a HTRW assessment. If the initial assessment indicates the potential for HTRW, further testing and analysis would be conducted during the project design to determine the path forward.
7	Naomi Huntley, Masters student, UVI	How will vegetation be replanted? Are there examples of the method used being successful? Will there be monitoring of replanted vegetation?	Replanting of vegetation is not proposed for this project. It is expected that native vegetation will recolonize the project area quickly due to a year round growing season.
8	Naomi Huntley, Masters student, 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.
9	Naomi Huntley, Masters student, 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 the design and procedural controls reduce turbidity impacts? What specifically is the spill contingency plan that will be implemented in the event of a spill?	<p>The Corps will coordinate water quality monitoring requirements with the U.S. Virgin Islands (USVI) Department of Planning and Natural Resources (DPNR) and will implement monitoring as prescribed by the project's permits (e.g. turbidity monitoring during discharge events).</p> <p>All required permits and authorizations will be obtained 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.</p>
10	Amanda Long, Masters student, University of the Virgin Islands (UVI)	The EA does not mention any monitoring.	Thank you for your comments. The Corps will coordinate water quality monitoring requirements with 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
11	Amanda Long, Masters student, UVI	Additionally, digging up sediment along a gut could potentially bring harmful metals or toxins into any water flowing into the gut.	During the project's PED phase, the Corps will conduct a HTRW assessment. If the initial assessment indicates the potential for HTRW, further testing and analysis would be conducted during the project design to determine the path forward.
12	Sonora Meiling Masters student, University of the Virgin Islands (UVI)	Is there a reason that the environmental surveys aren't being re-conducted?	Thank you for your comments. Additional engineering and environmental investigations to be conducted during the project's PED phase include an updated hydrologic and hydraulic (H&H) model, HTRW assessment, and wetland habitat functional analysis.
13	Sonora Meiling Masters student, UVI	Is there any plan to protect the mangroves that reside at the base of Turpentine Run from construction sedimentation and pollutants?	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.
14	Sonora Meiling Masters student, UVI	Will the displaced plant and animal populations have help with repopulation post construction? Or are they expected to return naturally?	Disturbed sediments will be replanted with native vegetation. Repopulation of fish and wildlife will occur naturally by species from neighboring areas.
15	Sonora Meiling Masters student, UVI	Although constructing is constricted above the Bovoni Road bridge, chemicals, sediment, and debris will run downstream via the gut and potentially essential fish habitats (EFH) in mangrove lagoon.	<p>Construction activities will occur both north and south of the Bovoni Road bridge. BMPs (e.g. silt fences) will be implemented for erosion control and to contain sediment during construction. Following construction, any disturbed sediment will be re-vegetated to natural conditions.</p> <p>Pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (MSFCA), the Corps coordinated with the National Marine Fisheries Service (NMFS) for effects to essential fish habitat (EFH). The Corps determined no effects to EFH would occur as a result of this project. In an email dated March 29, 2019, the NMFS concurred that "...any adverse effects from implementing the Recommended Plan to NOAA-trust resources would be minimal" and offered no EFH conservation recommendations.</p>
16	Sonora Meiling Masters student, UVI	The proposed drainage line will discharge anything running down the gut into mangrove lagoon, which will have the potential to affect essential fish habitats (EFH).	Pursuant to the MSFCA, the Corps coordinated with the NMFS for effects to EFH. The Corps determined no effects to EFH would occur as a result of this project. In an email dated March 29, 2019, the NMFS concurred that "...any adverse effects from implementing the Recommended Plan to NOAA-trust resources would be minimal" and offered no EFH conservation recommendations.

Comment Number	Commenter	Summary of Comment	Corps' Response
17	Sonora Meiling Masters student, UVI	Are there any precautions to be implemented and management plans developed for if the drainage line leaks?	The non-Federal sponsor (NFS), USVI Department of Public Works (DPW), will be responsible for the long-term operation and maintenance of the utility line.
18	Dan Mele, Graduate student, University of the Virgin Islands (UVI)	Which specific wetlands could possibly be impacted by this project?	Thank you for your comments. The Corps has identified two wetlands that may be affected as discussed in the EA. The project design avoids and minimizes destruction, loss, and/or degradation of wetlands. The design preserves and enhances the natural and beneficial values of wetlands in adjacent lands. Potential impacts to 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.
19	Dan Mele, Graduate student, UVI	The EA mentions that wildlife will be temporarily displaced but will return after the construction. Is there any evidence to back this up?	This type of behavior is common when there is similar, suitable habitat nearby that displaced wildlife would likely migrate to and use during construction. Following completion of construction, activity and noise levels revert to background and repopulation by nearby wildlife occurs naturally.
20	Dan Mele, Graduate student, UVI	What exact precautions will be carried out to protect the VI Tree Boa?	The Corps will implement the U.S. Fish and Wildlife Service (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.

Comment Number	Commenter	Summary of Comment	Corps' Response
21	Renata Platenberg, PhD Assistant Professor of Natural Resource Management, University of the Virgin Islands (UVI)	I disagree with the NEPA recommendation of a FONSI. My primary concerns include a lack of mitigation and restoration planning and an apparent lack of consultation of existing management recommendations.	<p>Thank you for your comments. Pursuant to NEPA, a Notice of Availability for the draft EA and proposed FONSI was coordinated with pertinent Federal and territory agencies and interested stakeholders for a 60-day review and comment period. Comments received were considered and addressed in the final EA. The Corps has completed agency review of this project and has determined that an EIS is not required.</p> <p>While portions of the Recommended Plan may affect wetlands, the project design avoids and minimizes destruction, loss, and/or degradation of wetlands. The design preserves and enhances the natural and beneficial values of wetlands in adjacent lands. Potential impacts to 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.</p>
22	Renata Platenberg, PhD Assistant Professor of Natural Resource Management, UVI	Sources of contaminant input into the Mangrove Lagoon from Turpentine Run include the Tutu Wellfield Superfund site, a wastewater treatment facility in Tutu, a scrap metal yard, and a concrete factory on Brookman Road, a dumpster after Bridge to Nowhere, the Racetrack, and general nonpoint source input from roads, septic and agriculture. NOAA and UVI studies have documented contaminants in Turpentine Run and Mangrove Lagoon that likely originate from land-based sources. Many land-based sources of contaminants were found to be above acceptable levels (Pait et al. 2013, Pait et al. 2014, Clower 2019).	The Corps is aware of the work conducted by the UVI and NOAA regarding contamination in Mangrove Lagoon. During the project's PED phase, the Corps will conduct a HTRW initial assessment in accordance with the guidelines provided in ER 1165-2-132. If the initial assessment indicates the potential for HTRW, further testing and analysis would be conducted during the project design to determine the path forward.

Comment Number	Commenter	Summary of Comment	Corps' Response
23	Renata Platenberg, PhD Assistant Professor of Natural Resource Management, UVI	Alteration of hydrology and contaminant input is likely to detrimentally affect Mangrove Lagoon fisheries and may have implications for human health within the territory.	<p>During the project's PED phase, the Corps will conduct a HTRW assessment. If the initial assessment indicates the potential for HTRW, further testing and analysis would be conducted during the project design to determine the path forward.</p> <p>Pursuant to the MSFCA, the Corps coordinated with the NMFS for effects to EFH. The Corps determined no effects to EFH would occur as a result of this project. In an email dated March 29, 2019, the NMFS concurred that "...any adverse effects from implementing the Recommended Plan to NOAA-trust resources would be minimal" and offered no EFH conservation recommendations.</p>
24	Renata Platenberg, PhD Assistant Professor of Natural Resource Management, UVI	Alteration of stream flow from Turpentine Run will potentially degrade bird habitat.	Temporary displacement of birds and other wildlife during construction may occur; however, these effects are expected to be minor and will cease with the completion of construction. The project design minimizes destruction, loss, and/or degradation of wetlands to the maximum extent practicable and preserves and enhances the natural and beneficial values of wetlands, which may improve bird habitat.
25	Renata Platenberg, PhD Assistant Professor of Natural Resource Management, UVI	To avoid any harm to the Virgin Islands Tree Boa, measures must be taken during any habitat clearance to ensure that vegetation removed is handled and disposed of carefully.	The Corps will implement the U.S. Fish and Wildlife Service (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.
26	Robles, Carlos	Infrastructure should be incorporated that would allow for the active general public (walkers, hikers, joggers, trail bikers etc.) to have access to and through the project for recreational and educational projects. The inclusion of bike lanes, walking and jogging lanes would encourage the already growing trend of active lifestyle changes being made by Virgin Islanders.	Thank you for your comments. This project's recreation features are discussed in section 4 of the EA. The project includes offsetting the impacts to existing features as well as the inclusion of a nature trail with interpretive signage and benches along the top of the levee. The location of the recreation features will be determined during the project's PED phase.
27	Robles, Carlos	There are two (2) additional projects that are worthy of consideration: Magen's Bay Watershed which is on the north side and Route 318 the Estate Bordeaux Road at the western end of St. Thomas.	Thank you for your comments. A recommendation should be submitted to your local constituent.

Comment Number	Commenter	Summary of Comment	Corps' Response
28	Desiree Ross	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 and include offsetting the impacts to existing features as well as the inclusion of a nature trail with interpretive signage and benches along the top of the levee. The location of the recreation features will be determined during the project's PED phase.
29	Desiree Ross	Will this project affect roadways where demolition and repair would be required? If yes, and the roads will need to be resurfaced, will the following facilities be included in the rebuild: Bike paths, sidewalks, pedestrian safety. If not, what steps are needed to have such infrastructure incorporated into existing plans?	This project will not require demolition and repair of roadways.
30	Boyd Sprehn, ESQ. Attorney-at-Law, Law Office of John H. Benham, P.C. on behalf of Olasee Davis, Professor, University of the Virgin Islands (UVI)	The purpose of our comments is to ask the Corps to review and seriously consider the findings and recommendations of the St Thomas East End Reserves (STEER) Watershed Management Plan (Management Plan).	Thank you for your comments. The Corps continues to coordinate with USVI Department of Public Works to ensure the project is consistent with the needs of the community.
31	Boyd Sprehn, ESQ. Attorney-at-Law, Law Office of John H. Benham, P.C. on behalf of Olasee Davis, Professor, UVI	We respectfully request the Corps to consider how the two competing uses for the designated land satisfy the goals set forth in the STEER Management Plan.	<p>Any conflicts with the use of the land and real estate interests (e.g. easements, rights-of-ways, relocations, etc.) would be coordinated with DPW prior to the start of construction.</p> <p>This project's recreation features are discussed in section 4 of the EA and include offsetting the impacts to existing features as well as the inclusion of a nature trail with interpretive signage and benches along the top of the levee. The location of the recreation features will be determined during the project's PED phase.</p>
32	Boyd Sprehn, ESQ. Attorney-at-Law, Law Office of John H. Benham, P.C. on behalf of Olasee Davis, Professor, UVI	Relocating a neighborhood park, which celebrates nature and the environment, will help to engage a diversity of local residents and businesses in STEER watershed restoration activities and inspire a sense of community ownership and activism.	Thank you for comment.

<b>Comment Number</b>	<b>Commenter</b>	<b>Summary of Comment</b>	<b>Corps' Response</b>
33	Boyd Sprehn, ESQ. Attorney-at-Law, Law Office of John H. Benham, P.C. on behalf of Olasee Davis, Professor, UVI	Preventing further development and devastation of mangroves at the terminus of the STEER watershed will not support existing efforts to advance sensitive habitat conservation goals.	The recommended plan is not encouraging or promoting further development within the project area, rather it is reducing damages.
34	Alma Winkfield Vice President (VP), Virgin Islands (VI) Trail Alliance	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 and include offsetting the impacts to existing features as well as the inclusion of a nature trail with interpretive signage and benches along the top of the levee. The location of the recreation features will be determined during the project's PED phase.

**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](#)

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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](#)

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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

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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:** [Naomi Huntley](#)  
**To:** [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)  
**Subject:** [Non-DoD Source] Comments on Turpentine Run and Savan Gut Environmental Assessment  
**Date:** Saturday, April 20, 2019 1:39:13 PM

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Dear Ms. Donofrio,

I am a Masters student at the University of the Virgin Islands. Both of the projects at Turpentine Run and Savan gut have the potential to decrease the probability of storm associated flooding, however there are some additional questions and concerns that have not been addressed in the associated Environmental Assessment drafts.

Wetlands are an important and threatened habitat. The report states that if a mitigation plan is needed, it will be developed later. It would be more effective to have this plan in place before something happens, and to change the plan as needed.

- Has any recent monitoring been done at the wetland area?
- Will monitoring occur during and after construction? Monitoring before, during, and after construction is important to determine how successful the project is and if there has been any damage to the wetland ecosystem.
- 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? This is something that should be monitored for as it has the potential to negatively impact the entire wetland ecosystem.
- o If there are pollutants, how can these be dealt with to minimize their spread to surrounding habitats?

#### Vegetation

- How will this vegetation be replanted (ie. Will current vegetation be transplanted, or new seeds planted?)
- o Are there examples of the method used being successful?
- o Will there be monitoring of the replanted vegetation to determine if replantation was successful?

#### Fish and Wildlife

- Will fish and wildlife populations be monitored to determine if they return to normal and how long it takes for that to occur?
- o If the fish and wildlife populations do not naturally rebound, what is the mitigation plan to help deal with this?

#### Water Quality

- 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?
- o How will they reduce turbidity impacts?
- What specifically is the spill contingency plan for hazardous, toxic, or petroleum material that will be

implemented in the event of a spill?

Overall my concerns are that these documents often refer to “standard protection methods” that will be implemented, however there is no explanation of what those entail. Additionally, monitoring of the wetland area before during and after construction is vital to monitor the success of this plan and to monitor what impacts it may have. Finally, there was no mention of how “success” of this project will be measured. Understanding how successful this plan is will likely require monitoring over a long period of time and is vital information that should be collected to improve future project, similar to this one. The previously mentioned issues should be addressed for both projects before being approved. Thank you for your time and consideration.

Sincerely,  
Naomi Huntley

**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

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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](#)

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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 maintenance construction for pre-existing channelization, new channelization, and a levee along the Turpentine Run/Nadir Area on St. Thomas, U.S. Virgin Islands. This project aims to reduce flooding and thus health and economic losses in the Nadir Area. Following are my comments and questions on the current proposed plan.

- Pg. 8: Is there a reason that the environmental surveys aren't being reconducted. I feel confident that the environmental extent and impact from humans has changed since the first survey in 1987.
- Pg 17: Is there any plan to protect the mangroves that reside at the base of Turpentine run from construction sedimentation and pollutants?
- Pg. 18: Will the displaced plant and animal populations have help with repopulation post construction? Or are they expected to return naturally?
- Pg. 18: Although constructing is constricted above the Bovoni Road bridge, chemicals, sediment and debris will run downstream via the gut and potentially affect essential fish habitats (EFH) in mangrove lagoon. In addition, the proposed drainage line will discharge anything running down the gut into mangrove lagoon, which will have the potential to affect essential fish habitats (EFH).
- Pg. 18/Overall: Are there any precautions to be implemented and management plans developed for if the drainage line leaks? If this happens the contents will surely be leached into the groundwater which can cause flooding and contamination.

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

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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 seek 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 included 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](#)

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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 **Turpentine Run**, 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.

While there is an undisputed need for flood abatement within the Nadir and Bovoni areas of the Jersey Bay Watershed on St. Thomas, increasing the channelization of existing water flow is likely not the most effective solution. The existing water flow originates in Tutu Valley, the location of the largest aquifer on St. Thomas, and receives input from a number of sources (identified below) as it traverses toward the Mangrove Lagoon. Natural or semi-natural wetland systems along the stream channel play a role in filtering contaminants from the water, and natural meanders and vegetated streambeds reduce flow velocity. Previous construction toward channelization created many of the flooding issues experienced today. The existing channelization also does nothing to temper the flow of land-based contaminants into the marine environment.

I disagree with the NEPA recommendation of a FONSI, and have identified some key issues that should be thoroughly addressed in an EA prior to further consideration of this project. My primary concerns include a lack of mitigation and restoration planning and an apparent lack of consultation of existing management recommendations (see relevant information at: [https://www.coris.noaa.gov/activities/projects/watershed/stthomas\\_reports\\_watershed.html](https://www.coris.noaa.gov/activities/projects/watershed/stthomas_reports_watershed.html)).

**Protected resources within or adjacent to the project area:**

- St. Thomas East End Reserves (STEER) designated marine reserves
- Benner Bay/Mangrove Lagoon Area of Particular Concern (APC)
- ESA-listed VI Tree Boa *Chilabothrus granti* (formerly *Epicrates monensis granti*), Hawksbill turtle (*Eretmochelys imbricata*), and Green turtle (*Chelonia mydas*)
- Migratory waterbirds
- Mangrove wetlands
- Fish nursery habitat

**Sources of pollution.** Sources of contaminant input into the Mangrove Lagoon from Turpentine Run include the Tutu Wellfield Superfund site, a wastewater treatment facility in Tutu, a scrap metal yard and a concrete factory on Brookman Road, a dumpster after Bridge to Nowhere, the Racetrack, and general nonpoint source input from roads, septic, and agriculture. NOAA and UVI studies have documented contaminants in Turpentine Run and Mangrove Lagoon that likely originate from land-



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*College of Science and Math*

based sources; many of these contaminants were found to be above acceptable levels (Pait et al. 2013, Pait et al. 2014, Clower 2019).

**Fisheries resources.** The Mangrove Lagoon offers essential nursery habitat for commercially important fish species. The juvenile fish are ultimately recruited into the adult reef fish population that forms the basis of the USVI commercial fishery. Alteration of hydrology and contaminant input is likely to detrimentally affect this resource and may have implications for human health within the territory.

**Bird habitat.** The mangroves of Benner Bay and the Mangrove Lagoon, as well as the wetland between the Bridge to Nowhere and the lagoon, provide valuable habitat for resident and migratory water birds. Alteration of stream flow from Turpentine Run will potentially degrade these habitats.

**Virgin Islands Tree Boa.** The boa is likely to occur throughout the Turpentine Run stream channel, although it has only been documented at and near to Ecotours. This species is cryptic and displays low vagility, and as such it is extremely difficult to locate. Just because they are not observed does not mean that they are not there, and to avoid any harm to them measures must be taken during any habitat clearance to ensure that vegetation removed is handled and disposed of carefully.

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](mailto:Renata.platenberg@live.uvi.edu)

Literature cited:

Clower, P.O. 2019. An investigation into the temporal and spatial trends of contaminants in Mangrove Lagoon, St. Thomas East End Reserves (STEER), U.S. Virgin Islands. Master of Marine and Environmental Science thesis, University of the Virgin Islands, St. Thomas.

Pait, A.S., Hartwell, S.I., Mason, A.L., Warner, R.A., Jeffrey, C.F., Hoffman, A.M., Apeti, D.A. and Pittman, S.J., 2014. An assessment of chemical contaminants in sediments from the St. Thomas East End Reserves, St. Thomas, USVI. Environmental monitoring and assessment, 186(8), pp.4793-4806.

Pait, A.S., Hartwell, S.I., Mason, A.L., Warner, R.A., Jeffrey, C.F., Apeti, D.A. and Pittman, S., 2013. An assessment of chemical contaminants detected in passive water samplers deployed in the St. Thomas East End Reserves (STEER). NOAA Technical Memorandum NOS NCCOS 157

**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](#)

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Hello Ms. Donofrio:

Please accept my apologies 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 even if it is not included in the official record.

Regards

Carlos Robles

Carlos Robles  
P.O. Box 374 EGS  
St. Thomas, VI 00804  
340-776-2885 (h)  
340-626-9245 (m)  
[c\\_losrobles@yahoo.com](mailto: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.

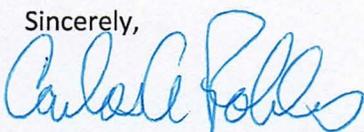
Regarding the Turpentine Run Project, if the rendering is any indication of the final outlay of the hardscape/ infrastructure, the inclusion of bike lanes, walking and jogging lanes (to rubberized jogging lane) would encourage the already growing trend of active lifestyle changes being made by Virgin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



**From:** [Desiree Ross](#)  
**To:** [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)  
**Subject:** [Non-DoD Source] Comments for the Savan Gut/ Turpentine Run projects, St. Thomas  
**Date:** Friday, April 19, 2019 9:26:18 AM

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Ms. Donofrio-

#### 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 managed by the Army Corps of Engineers; the Turpentine Run and the Savan Gut projects.

Per the article at the local St. Croix Source's website Blocked<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)

Blocked<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: Blocked<https://www.cdc.gov/features/walk-friendly-communities/index.html>

For more information on the activities at the USVI Walkability Institute, please reference the following link: Blocked<https://islandcustom2014.wixsite.com/2017usviworkshop/post-workshop>

Sincerely,  
Desiree Ross

Desiree Ross EMAIL CONFIDENTIALITY : The information contained in this message may be privileged, confidential, and protected from disclosure. If you are not the intended recipient, or an employee, or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please delete from your computer .

-----Original Message-----

From: Desiree Ross <dsrross@aol.com>

To: Kristen.L.Donofrio <Kristen.L.Donofrio@usace.army.mil>

Sent: Thu, Apr 4, 2019 2:14 pm

Subject: Walkability / Turpentine Run study

Hello Ms. Donofrio-

I received your email from the below article:

Blocked<https://stcroixsource.com/2019/04/04/quick-turnaround-on-turpentine-run-study-could-unlock-unlock-federal-funds/>

I am working with the USVI Department of Health to increase walkability in the US Virgin Islands. The project is the construction of a levee or channel. Will this project affect the roadways were demolition and repair would be required? If yes, and the roads will need to be resurfaced, will the following facilities be included in the rebuild:

\*

B Bike paths

\* Sidewalks

\* Pedestrian safety signs/ cross walks

If not, what steps are needed to have such infrastructure incorporated into the existing plans. There was a mention that the project is near the development of the new racetrack.

To learn more on the USVI Walkability Institute, please reference the following website:

Blocked<https://islandcustom2014.wixsite.com/2017usviworkshop/post-workshop>

Desiree Ross EMAIL CONFIDENTIALITY : The information contained in this message may be privileged, confidential, and protected from disclosure. If you are not the intended recipient, or an employee, or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please delete from your computer .

**From:** [Boyd L. Sprehn](#)  
**To:** [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)  
**Subject:** [Non-DoD Source] Turpentine Run CAP Conversion Project Comments  
**Date:** Monday, April 22, 2019 11:01:48 PM  
**Attachments:** [ACE Turpentine Run CAP Conversion Comments \(as submitted\).pdf](#)

---

Ms. Donofrio:

Please see attached comments. As the 20th fell on a Saturday (in the middle of Easter weekend), today is the next business day. We thank you for your attention to this matter, and for your work on behalf of the Virgin Islands.

Boyd L. Sprehn, Esq.  
Law Office of John H. Benham, P.C.  
P.O. Box 11720  
St. Thomas, VI 00801  
9800 Buccaneer Mall, Bldg. 2, Suite 9  
St. Thomas, U.S. Virgin Islands 00802  
[sprehn@benhamlawvi.com](mailto:sprehn@benhamlawvi.com)  
O: 340-774-0673  
C: 340-643-2660  
Fax: 800-948-1947

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April 22, 2019

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

**Via E-mail Only:** [Kristen.L.Donofrio@usace.army.mil](mailto:Kristen.L.Donofrio@usace.army.mil)

**Re: Turpentine Run CAP Conversion Project  
Turpentine Run/Nadir Area St. Thomas, US Virgin Islands**

Dear Ms. Donofrio:

Thank you for the opportunity to provide input on the U.S. Army Corps of Engineers (Corps) update to the Turpentine Run/Nadir Area Draft Detailed Project Report (DPR) and Environmental Assessment (EA). The study area includes the Nadir development and Turpentine Run, located at the southeastern end of St. Thomas. This area is part of the largest watershed on St. Thomas, covering 6.2 square miles, the terminus of which is the St. Thomas East End Reserves (STEER). STEER is a 3.7 sq. mile collection of marine reserves and wildlife sanctuaries that include the last remaining mangrove lagoon on St. Thomas and is one of the Territory's most significant nursery grounds for commercially and recreationally-important fisheries. Included within STEER is Mangrove Lagoon/Benner Bay, an area designated by the United States Virgin Islands (USVI) Legislature as an Area of Particular Concern and a Class B Water, deserving specialized attention and protection in any planning and construction process. Unfortunately, the STEER watershed is arguably one of the most heavily contaminated watersheds in the USVI.

Turpentine Run is one of the few semi-permanent streams in the USVI with some of its flow consisting of wastewater discharges from sewage plants. Extensive nutrient inputs also occur in the uppermost section of the stream from agriculture activity and in the lowest section from horses at the racetrack. Wastewater effluent and storm water flowing into Turpentine Run significantly impacts and degrades the water quality of Mangrove Lagoon.

The purpose of our comments is to ask the Corps to review and seriously consider the findings and recommendations of the St Thomas East End Reserves Watershed Management Plan (Management Plan), a document developed to inform territorial management decisions related to STEER protection and restoration.<sup>1</sup> The Management Plan was developed for the National Oceanic and Atmospheric Administration (NOAA) Coral Reef Conservation Program (CRCP), the USVI Department of Planning and Natural Resources (DPNR), and The Nature Conservancy (TNC). It was developed pursuant to a NOAA CRCP sponsored watershed assessment and planning effort and focused on the identification of potential land-based threats to STEER. The project included a concurrent sediment sampling and biological monitoring project, along with a study of current uses within STEER. The plan identified three priority objectives for use in watershed management decisions:

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<sup>1</sup> See [https://www.coris.noaa.gov/activities/projects/watershed/stthomas\\_reports\\_watershed.html](https://www.coris.noaa.gov/activities/projects/watershed/stthomas_reports_watershed.html)

1. To meet existing federal and territorial public health criteria and water quality standards by reducing sediment, bacteria, nutrients, and other contaminant loading to STEER;
2. To engage a diversity of local residents and businesses in STEER watershed restoration activities and inspire a sense of community ownership and activism; and
3. To support existing efforts to improve development regulations and advance sensitive habitat conservation goals.

### **Background**

According to the USGS, flooding is a major concern in the USVI because of stream-flow characteristics and topography. This is particularly true within Turpentine Run and the Nadir area where streams are not perennial and the watershed has a high percentage of steep slopes. Short periods of intense rainfall generate high-volume runoff that causes short duration, localized flooding as water rushes from the mountains to less steep areas on its path to the sea. Nadir is a completely developed urban area through which Turpentine Run flows as a concrete channel with insufficient capacity to contain flood flows and as a result causes regular flooding throughout the area, doing nothing to protect or improve conditions in the STEER.

To address flooding problems in the area, the Corps conducted an investigation into alternatives for managing flood problems in Turpentine Run and the Nadir Area in the early 1990s. In accordance with the National Environmental Policy Act of 1969 (NEPA), the Corps issued a draft Environmental Assessment in November 1994. Varying levels of flood risk reduction were evaluated in the alternatives analysis along with the overall economic, environmental and social impacts of the work, and a preferred alternative was identified (the Recommended Plan). The Recommended Plan included the following actions:

- Construction of a 460-foot long concrete “U” shape channel that transitions to a trapezoidal, earthen channel (1,385 feet long) lined with rip rap;
- Construction of a drop structure and 170-foot long sheetpile wall along the developed side of the channel;
- Construction of a 260-foot levee along the northern edge of Nadir;
- Construction of a 1,300-foot long levee starting south of the new Bovoni Road Bridge and ending at the Nadir racetrack with rip rap on the left side of the channel as it flows around the corner of the racetrack;
- Construction of an interior drainage conveyance from the existing small concrete channel by a 72-inch underground pipe (length of 1,745 feet) which run under the levee footprint and racetrack and ultimately discharge into Mangrove Lagoon; and
- The relocation of a public park taken to accommodate flood control features to the northeast corner of the government-owned Nadir racetrack property, next to the former grandstand area.

The Recommended Plan specifically was designed to minimize the destruction, loss and/or degradation of wetlands and to preserve and enhance the natural and beneficial value of wetlands. All “practicable means to avoid and minimize adverse environmental effects [were] incorporated into the recommended plan.”<sup>2</sup> The plan, however, was never finalized or implemented.

Flooding issues have worsened since 1994 due to increased development and strengthening in storm intensity (e.g. Hurricanes Irma and Maria), but as yet we have no solution. In fact, it was the flooding effects from Hurricane Maria, which hit the Island in September 2017 that resulted in the renewed interest to finalize the EA and move the project forward. The Corps confirmed that it is in the public interest to move forward with its flood mitigation project, but identified a list of considerations, including the following as relevant to its re-evaluation of the 1994 Recommended Plan: vegetation, wetlands, endangered and threatened species, fish and wildlife resources, water quality, aesthetic resources, recreation resources, unavoidable environmental effects and cumulative effects (among others). The Corps also pointed out that the proposal for redevelopment and expansion of the Nadir racetrack is delaying progress.

### **Considerations Relevant to the Recommended Plan**

During the initial EA, several plans were developed and evaluated to determine their effectiveness in reducing flooding and their overall economic, environmental, social and other impacts. As a result of the investigation, a Recommended Plan was identified that included construction of a new channel and levee for flood damage reduction. The levee is to be constructed between Bovoni Road and the government owned Nadir racetrack, which is adjacent to wetlands of a high interest value and would overlook Mangrove Lagoon.

The Recommended Plan unfortunately requires construction of flood control features on land that historically was used as the Nadir Neighborhood Park. To avoid any loss of recreational resources, the Recommended Plan includes construction of a replacement park in the vicinity of the racetrack. The proposal envisioned a park with nature walks along the newly constructed levee, a picnic pavilion and picnic tables with game boards, running water, a playground and a multi-purpose court. Walkways, benches and interpretive signage for the nature trail would be incorporated on the earthen levee to give park patrons an enjoyable and informative trail experience. Scenic vistas from the levee top would be accented and framed for the patrons’ enjoyment.

Property located to the north and east of the former racetrack grandstand (the designated land) provides sufficient land to replace amenities associated with the old Nadir Neighborhood Park, and access to the new levee where nature trails for pedestrians and bicycle riders will be developed. The plans intended for the new park to co-exist with the existing racetrack, so that both facilities could be enjoyed by Island residents.

Conflicting with the park relocation plan, is the existence of a recently proposed capital improvements plan for the Clinton E Phillips racetrack, construction of a new stadium and casino by Virgin Islands Gaming Limited Operations. While the racetrack revitalization and casino project would include improvements for the stables and racetrack itself, it also envisions construction of a casino, a three-story grandstand and expansive impervious parking for more than 330 cars. The racetrack revitalization and casino project intends on tripling the number of patrons who may attend any given

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<sup>2</sup> See US Army Corps of Engineers February 2019 Draft Environmental Assessment, p. 1.

event, and would preclude any other use of the EA designated land. The proposed redevelopment and expansion of the Nadir racetrack was recently approved by the Coastal Zone Management Commission. However, the appeal period for the permit has not lapsed and construction of the facilities have **not commenced**. As such, use of the designated land as proposed in the EA remains a viable option.

Relocation of the Nadir Neighborhood Park to the land located northeast of the former racetrack grandstand is the best use of that land. Use of the designated land as a park will reduce flooding and contribute to economic development while protecting the integrity of the area's most important environmental resources. Park patrons would enjoy an increased awareness of the immediate environment and its inhabitants with the implementation of nature walks on top of the levee. Rather than further developing the last remaining mangrove lagoon on St Thomas for a commercial profit, the relocation of the park will protect wildlife and plant life and establish a positive natural environment for everyone to admire and enjoy the environment. Use of the designated land as a Neighborhood Park will have the least impact on the environment and further stated goals of federal environmental laws and the Virgin Islands Coastal Zone Management Program. Given the severity and frequency of flooding in Turpentine Run, no-action is not acceptable.

Relocation of the Neighborhood Park was not intended to impact current use of the adjacent racetrack, but rather complement the facility. However, the proposed redevelopment and material expansion of the existing racetrack will impact the use of the designated land as a park (and could prevent the installation of the required drainage feature under the track). Currently, the Clinton E. Phipps Racetrack redevelopment project contemplates use of the designated land for a paved parking area. Expanded impervious surfaces will undoubtedly increase flow rates into Turpentine Run and potentially further increase flooding and adverse environmental impacts on surrounding wetland and wildlife habitats. These effects contravene a central purpose of the Recommended Plan-to reduce adverse effects resulting from the flooding of Turpentine Run.

In addition to the foregoing, redevelopment of the racetrack will necessarily destroy more wetlands. The Corps has ignored prior obligations for habitat restoration at and around the existing racetrack. Historically, the southern end of the STEER watershed contained extensive wetlands. A large portion of these wetlands were illegally filled years ago, and the existing Nadir racetrack was constructed over fill. While little has been done to rectify that situation, DPNR is on record stating that the "facility impacted mangrove wetlands associated with Mangrove Lagoon and Turpentine Run. As a result a mangrove mitigation plan was developed for the issuance of the Army Corps of Engineers Perm (80J-5033). Based on a review of information provided in connection with the planned redevelopment of the racetrack and the mitigation plan, among other issues, the following habitat restoration action has not been completed at and around the existing racetrack: the fill associated with the southwest section of the track was not fully removed and mangrove vegetation has not recolonized this area. Construction plans show this area as having buildings 60, 57 and the southwest chute. The fill in this area restored to mangrove habitat as it was authorized on the mitigation plan."<sup>3</sup>

Based on all of the above, we respectfully request the Corps to consider how the two competing uses for the designated land satisfy the goals set forth in the STEER Management Plan. Expanding the racetrack (which currently has no stated mitigation measures for treating horse manure at and around the site), will not be an action that helps the area meet or exceed water quality standards in Mangrove

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<sup>3</sup> See Letter from Edwin E. Munir, Field Supervisor with the DPNR Division of Fish and Wildlife to Jean-Peirre Oriol, Director of CZM, dated September 21, 2018.

Turpentine Run CAP Conversion Project  
Army Corps of Engineers – Jacksonville District  
Attn: Ms. Kristin L. Donofrio  
**Error! Reference source not found.**  
Page 5

Lagoon. Relocating a neighborhood park, which celebrates nature and the environment, will help to engage a diversity of local residents and businesses in STEER watershed restoration activities and inspire a sense of community ownership and activism. And, preventing further development and devastation of mangroves at the terminus of the STEER watershed will not support existing efforts to advance sensitive habitat conservation goals.

Best regards,

Boyd L. Sprehn  
Attorney-at-law  
[sprehn@benhamlawvi.com](mailto:sprehn@benhamlawvi.com)  
340-774-0673  
P.O. Box 11720  
St. Thomas, VI 00801  
On behalf of:  
Olasee Davis, Professor  
University of the Virgin Islands



US Army Corps of Engineers  
JACKSONVILLE DISTRICT

# TURPENTINE RUN/NADIR CAP CONVERSION PROJECT IN ST. THOMAS, USVI

Project Open House April 3, 2019

5pm – 7pm

Bertha C. Boschulte Middle School

NAME: Marvin Blyden

AGENCY: Senator

PHONE: 340-513-2525

EMAIL: Senatorblyden@gmail.com

COMMENTS: We need to keep the  
Basketball court within the  
community & keep the playground  
also, we need to keep our recreational  
facilities & green space.

*(Please use the back if need be.)*

The Corps believes this study will benefit from public involvement and thanks you for your comments and participation today.

**From:** [ALMA WINKFIELD](#)  
**To:** [Donofrio, Kristen L CIV USARMY CESAJ \(USA\)](#)  
**Subject:** [Non-DoD Source] Pedestrian Supported Infrastructure for Savan and Turpentine Run Projects  
**Date:** Wednesday, April 10, 2019 5:50:38 PM  
**Attachments:** [Support Letter for Savan and Turpentine Run.docx](#)

---

Good Afternoon;

Please find a letter attached to this email in support of pedestrian supported infrastructure for the Savan Gut and Turpentine Run Projects.

Thank You

Alma Winkfield

340-643-7275



*A project of the St. Croix Foundation*

April 10, 2019

Ms. Kristen Donofrio

[Kristen.L.Donofrio@usace.army.mil](mailto: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

[Vitralliance@gmail.com](mailto:Vitralliance@gmail.com)

Vitrials.org

340-643-7275

