

Finding of No Significant Impact

*Virgin Islands National Park Caneel Bay Area Redevelopment and
Management Environmental Assessment*

July 2023



**National Park Service
US Department of the Interior**

**Virgin Islands National Park
US Virgin Islands**

**FINDING OF NO SIGNIFICANT IMPACT
Virgin Islands National Park
Caneel Bay Area Redevelopment and Management Environmental Assessment**

Recommended:

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Date

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INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an environmental assessment (EA) to examine alternative actions and environmental impacts associated with the redevelopment and management of the Caneel Bay area at Virgin Islands National Park (the Park). Action is needed to address ongoing cultural and natural resource impacts associated with the 2017 hurricanes (Irma and Maria) and to integrate the Caneel Bay area into the overall management of the Park. This integration includes making the area accessible and welcoming to the local community, overnight lodging guests, and Park visitors once the Retained Use Estate (RUE) expires on September 30, 2023. The purpose of the action is to identify a sustainable and resilient redevelopment strategy for the Caneel Bay area that (1) integrates the value and history of the community of St. John; (2) preserves and protects its significant cultural and natural resources; (3) provides a range of visitor experiences, including overnight and day-use opportunities; and (4) promotes economic activities.

The EA was prepared in accordance with the NEPA, the regulations of the Council on Environmental Quality (CEQ) for implementing NEPA (40 *Code of Federal Regulations* [CFR] 1500-1508), NPS Director's Order (DO) 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*, and the 2015 NPS NEPA Handbook. The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. Relevant sections of the EA are summarized and incorporated by reference below. The EA is available at <https://parkplanning.nps.gov/CaneelBayRedevelopment>.

The Caneel Bay Historic District was determined eligible for listing in the National Register of Historic Places and contains 109 contributing elements including 71 buildings, 24 sites, 13 structures and one object. As a result, the NPS also prepared a Programmatic Agreement (PA) to comply with the requirements of Section 106 of the National Historic Preservation Act (NHPA), as amended, and its implementing regulations (36 CFR 800). As described in the PA, the NPS would continue consultation with the US Virgin Islands State Historic Preservation Office (VI SHPO) and interested parties during future planning and design.

Members of the public were provided several opportunities to comment during the planning process. The NPS held listening sessions in April 2021 to listen to ideas and concerns from the community-at-large. The NPS conducted follow-on civic engagement with the public consisting of public meetings and a public comment period from January 18 to March 4, 2022. During this public comment period, the public was asked to comment on the preliminary purpose and need and preliminary concepts for redevelopment presented in a project newsletter and during a virtual public presentation on February 8, 2022. The EA was released to the public for review on January 20, 2023, and the public was invited to submit their comments through March 6, 2023. The NPS held one virtual and multiple in-person public meetings in February and March 2023. A summary of public outreach activities and comments received with NPS responses from the NPS is provided in Attachment D. Minor modifications to the EA are provided in Attachment A. A non-impairment determination is included in Attachment B.

SELECTED ALTERNATIVE AND RATIONALE FOR DECISION

Selected Alternative

The NPS analyzed two alternatives in detail in the EA. Based on this analysis, the NPS selected Alternative B as the alternative for implementation because it best meets the purpose of, and need for action, without causing significant impacts on Park resources. The selected alternative is described in the EA in chapter 2 and includes a programmatic approach, which (1) is dependent on the NPS conducting more detailed site-specific condition assessments for subsequent NEPA and National Historic Preservation Act (NHPA) analyses once full access to the site is obtained; and (2) requires more detailed redevelopment plans, which will be created in collaboration with a future developer selected by the NPS through a competitive commercial services process.

The selected alternative will supplement the Park's existing 1983 general management plan (GMP) to provide specific management planning guidance for the Caneel Bay area as part of the Park's overall planning portfolio.

Future transportation system planning, such as the review of existing transportation infrastructure, site circulation including site drop-off and pick-up areas, and parking, will be conducted when full NPS access to the site is obtained and in coordination with more detailed site planning. In-water work and changes to the existing moorings are not being proposed as a part of the selected alternative. Future site-specific compliance and public involvement will be conducted if these actions are pursued. As part of Park-wide planning efforts, the NPS could elect to require an amenity fee for enhanced services or parking fees to help manage visitation at various sites within the Park that are not specific to the Caneel Bay area.

The selected alternative redevelopment and management approaches for the Caneel Bay area are presented in **Table 1**, which describes the management zones that correlate to the shaded areas in **Figure 1**. Management zones are designated areas that will help future planning and identify where specific desired conditions will be established and appropriate uses are defined.

Table 1. Management Zone Descriptions

Zone (Acreage)	Description (Desired Condition)	Facilities/Activities
<p>Lodging Zone (67 acres)</p>	<p>Visitors will be provided an overnight experience commensurate with storied legacy and site history of Caneel Bay. The overnight experience will be that of a twenty-first century eco-resort. In this zone, the overnight lodging and amenities will be that of an eco-destination and model for sustainable management practices that participate in a circular island economy (explained further in the “Future Commercial Opportunities” section of the EA). This zone will be managed through a lease(s) and/or concession contract(s). This zone will include visitor amenities, such as dining and gift shops to support the overnight guests. The operator(s) will be responsible for sustainable operations. Areas with evidence of past disturbance, such as the tennis court area, will be a focus of new development because these areas are suspected to have low natural and archeological resource potential.</p>	<ul style="list-style-type: none"> • Overnight lodging and amenities will be provided such as lodging, dining, gift shops, beach access, employee housing, and associated infrastructure. • The redevelopment will attempt to reuse existing structures and infrastructure where possible. However, the integrity of the structures is unknown, and the NPS cannot predict what can be reused or repurposed at this time. • Ongoing maintenance activities will occur, such as landscaping, mowing, and general upkeep of the grounds, including trash removal and cleaning of facilities. • Public access of day-use areas and facilities via roads and trails in this zone will be a condition of any lease(s) or concession contract(s) and coordinated with the larger Caneel Bay area redevelopment. • Utility corridors and pipelines will exist to support facilities.
<p>Day-use Zone (5 acres)</p>	<p>Visitors, including residents of St. John, will be provided access to several beaches within the Caneel Bay area for recreation/day-use. In this zone, visitors will be provided amenities to enhance the visitor experience. Management by the NPS will be consistent with other public beaches at the Park, and concessions contracts will be used to provide visitor services.</p>	<ul style="list-style-type: none"> • Public bathrooms/shower facilities. • Picnic areas/tables. • Food services by concessioner. • Equipment rentals (i.e., non-motorized watersport rentals). • Swimming, snorkeling, and other water activities.
<p>Conservation Zone (78 acres)</p>	<p>All Park visitors will be able to connect with the natural areas of the Park through pedestrian access on some existing roads and trails throughout the Caneel Bay area. This zone will be managed by the NPS. The desired condition in this zone is a natural and undeveloped landscape. The undeveloped nature of this zone will aid in the protection of areas with high archeological resource potential.</p>	<ul style="list-style-type: none"> • Reestablish the Turtle Point and Hawksnest Trails. • Some limited expansion of pedestrian trails to support connectivity throughout the site. • No new development for overnight lodging or amenities.

Zone (Acreage)	Description (Desired Condition)	Facilities/Activities
Interpretive/ Engagement Zone (11 acres)	All visitors will have an opportunity to have a national park experience by engaging with the NPS onsite, including through an NPS visitor contact station. Visitors will be encouraged to learn about the site's history through interpretation of cultural sites, including the archaic, colonial, and post-emancipation era sites. Resources in this area will be managed and maintained by the NPS. All of the archeological sites previously determined eligible for the National Register of Historic Places, including the plantation sugar factory complex, are located within this zone and will be subject to active NPS preservation.	<ul style="list-style-type: none"> • NPS entrance/contact station. • Restoration or rehabilitation and upkeep of historic structures and sites by the NPS. • Interpretive program to tell the story of the Caneel Bay area, including interpretive sites and signage.
Operations/ Maintenance Zone (7 acres)	This zone will support all operations and maintenance activities within the Caneel Bay area. Some space could be dedicated for NPS use to aid in operational efficiencies. This area will be visibly shielded from visitors, and access will be restricted to authorized personnel only. This zone contains historic buildings and landscape features that will be preserved and adaptively reused, as practicable. The NPS will ensure the preservation of the contributing historic buildings in this zone through their adaptive or active reuse.	<ul style="list-style-type: none"> • Maintenance buildings. • Staff parking lots. • Administrative offices. • Infrastructure facilities (e.g., septic systems, utility distribution facilities, etc.). • Maintenance equipment and vehicle storage for overnight lodging operations. • Water treatment facility. • Utility corridors and pipelines.
Flexible Development Zone (7 acres)	This zone includes lands that were previously disturbed (i.e., landfill, water catchment area) and will be available for future developers/operators to utilize as part of their operations.	<ul style="list-style-type: none"> • Use to be determined in consultation with future developers/operators but could include storage and parking, among other uses.

Virgin Islands National Park

Caneel Bay Area – Selected Alternative

National Park Service
US Department of the Interior

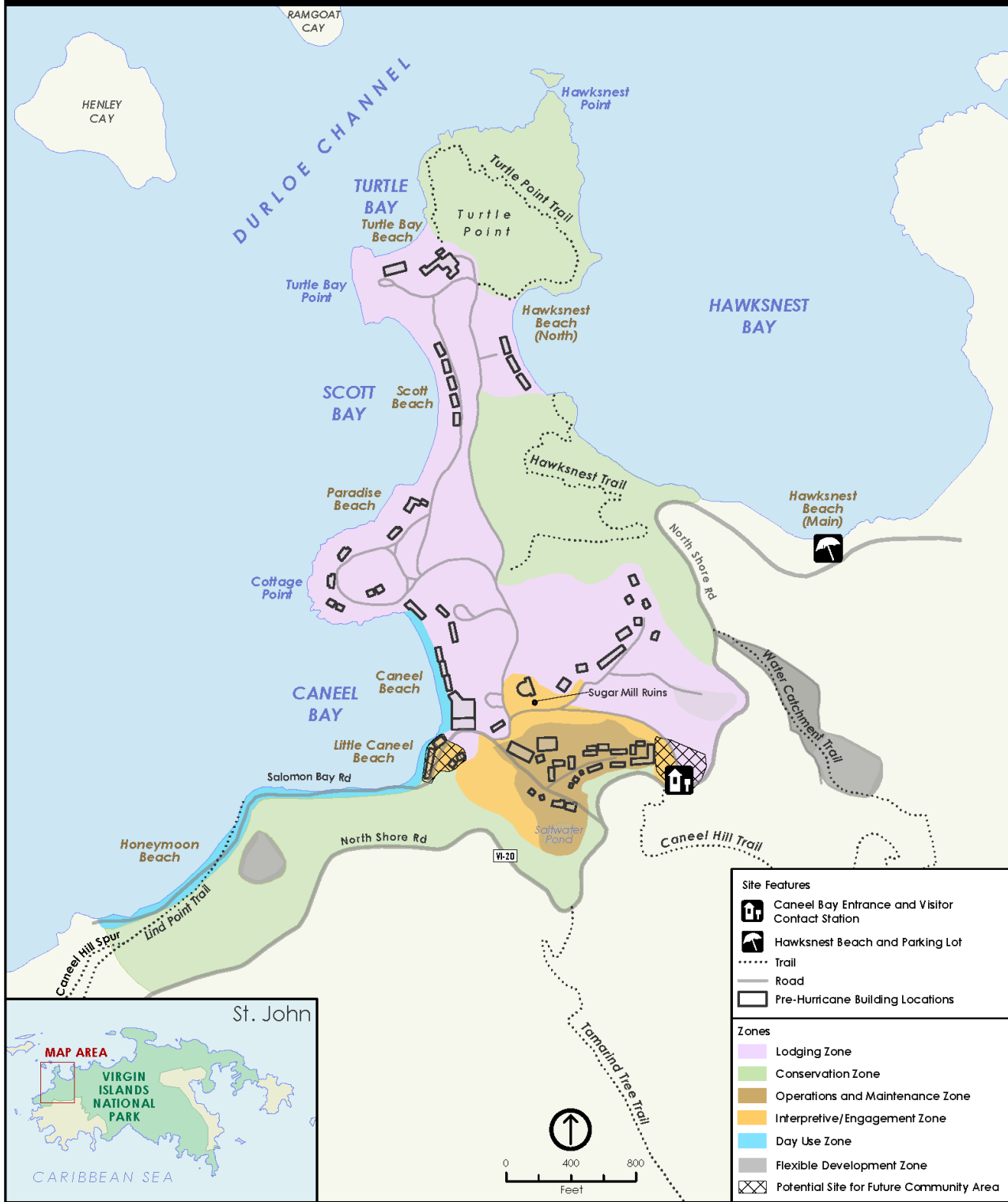


Figure 1. Selected Alternative

Additional elements under the selected alternative include the following:

Greater Public Access

The selected alternative provides for greater public access to the Caneel Bay area, including day-use access at some locations, such as Honeymoon Beach, Little Caneel Beach, and Caneel Beach. The NPS will work with the developer(s) to seek appropriate access (such as accessible parking, roads, and trails where feasible) to other beaches and other parts of the site. Access will continue to be permitted along shoreline areas specified in the USVI Open Shoreline Act and will be determined in consultation with the USVI Department of Planning and Natural Resources (VI DPNR).

Natural Resources Protection

The NPS and its partners will continue monitoring, protecting, and if necessary, restoring natural resources such as sea turtles, coral, seagrasses, and sensitive vegetation species. Through the authorities from the concessions, leasing, and/or CUA programs, the NPS will provide management and oversight of the lodging operations and other commercial services at the Caneel Bay area to ensure compliance with applicable regulations and resource protection measures, as well as the requirements of any commercial services contracts. The developer/operator will be responsible for ensuring day-to-day management of natural and cultural resources in coordination with the NPS throughout the duration of the permit, lease, contract, or agreement.

Several measures for water conservation could be incorporated into future plans for redevelopment such as incorporating practices to capture and treat stormwater from the site, thereby improving water quality and reducing stormwater runoff resulting in sedimentation into the marine environment. The NPS will work with the developer to maximize water collection and reuse of water at the site. For instance, water could be sourced in cisterns built in strategic locations, such as below the new structures. Each structure could be outfitted with roof catchment and water treatment capabilities. Any new facilities or earth grading to convey water to treatment facilities will be designed to minimize impacts to existing resources. The addition of these practices will help convey stormwater runoff to collection systems, promote reuse of the water, reduce erosion, and improve water quality.

Cultural Resources Protection

Cultural resources protection, including surveys to identify and document resources and determine the condition of these resources—which include historic buildings, structures, objects, historic ruins (categorized as sites), landscape features, and archeological sites within the historic district—will occur, as defined in Section 110 of the NHPA. The NPS will provide management and oversight for resource protection and compliance activities in the Caneel Bay area under any future lease(s) or commercial services contracts for the redevelopment of the area. To the extent practicable, the NPS will seek to preserve and/or rehabilitate historic properties and cultural resources within the project area and will seek to minimize or avoid further impacts that could occur because of redevelopment activities. NPS will require new development to be sited in previously disturbed areas and designed in a context sensitive manner that considers the historic designed landscape and contributing resources of the historic district as well as the cultural landscape. The NPS will complete the initial condition assessments of historic properties and cultural resources then, further assessment can be formulated by the NPS, if necessary, and rehabilitation plans will be developed in consultation with the VI SHPO and future developers. Due to the phased access to the site and the phased redevelopment strategy, the NPS and the VI SHPO have entered into a Programmatic Agreement (PA) to define the consultation and evaluation process for the

treatment of historic properties within the project area in accordance with 36 CFR 800. The PA is provided as Attachment C.

Overnight Guest Experience Commensurate with the Site History

Under the selected alternative, the NPS will work with one or more developer/operators to create an overnight visitor experience that is mindful of the design intent of the resort from the mid-twentieth century. Laurance Rockefeller's vision (and the design intent of his architectural team) for Caneel Bay was to be a complementary feature to the St. John landscape by referencing vernacular building traditions and architectural forms (Jaeger and Labrie 2012). Laurance Rockefeller's investment and interest was in the development of a low-density, landscape-sensitive resort. This resort referenced the vernacular architecture and respected and made room for the traditional building materials and craftsmanship that could be found on island. The design team made use of what they considered to be native materials of local stone, stucco, and wood and locally inspired colors. The layout of the buildings was intended to produce a "harmonious unity" with the site and landscape. All overnight lodging concepts proposed by a developer/operator will not exceed previous lodging capacity of 166 guest rooms.

The nature and type of overnight accommodations was not evaluated in the programmatic analysis of the EA, and any determination(s) will be made at a later date in coordination with developers following additional analysis. In addition, the selected alternative does not preclude the NPS or developer/operator from proposing some elements, including, but not limited to, a farmers' market, wellness facilities, etc. as long as they are consistent with NPS management policies.

Future Community Space/Partnerships

Two areas at the Caneel Bay area have been identified as potential locations for future community spaces (**Figure 1**), including one with low topographic relief (flat) close to the entrance roadway and another area near Little Caneel Beach closer to the water. The selection of two distinct locations was intentional to provide varying experience and opportunities. Both areas have direct access into the Caneel Bay area via the entrance roadway from North Shore Road and will not require visitors to enter the Lodging Zone. The area closest to the entrance is flat and open. This area could be suitable for a built or open community space such as a heritage center, indoor/outdoor market space, meetings and event space, or performance area that could host festivals, music or art events, community gardens or horticulture, or showcase the island's culinary arts or crafts, as long as the activities are consistent with NPS management policies. The second area near Little Caneel Beach could potentially repurpose an existing building at Little Caneel Bay or use the topography to create an amphitheater or other type of meeting space that overlooks the clear, turquoise waters of Caneel Bay. This space could be used by partner organizations to hold a wide array of events to showcase such elements as the site history, local culture, astronomy, or marine environment. Each of the two areas could be used to provide simple exhibits featuring local crafts, music, literature, visual arts, or cuisine.

If an opportunity affords, the NPS will work with a partner to fund and operate the community space. Like other aspects of the redevelopment, the exact location, size, need and use for the two areas are unknown at this time and additional site-specific compliance will be completed before implementation. The NPS will determine the appropriate mix of community and commercial space based on a number of factors, including, but not limited to: responses to requests for expressions of interest, interpretive needs of the Park, and the financial ability of community groups to finance and develop community

spaces. If a partner is not identified to fund or operate a community space, the NPS would determine how the area would be managed into the future and further evaluation would be conducted.

Future Commercial Opportunities

In future commercial use planning processes, a request for proposal (RFP) will seek ideas from developers following the objectives and prescribed conditions under the selected alternative. The Caneel Bay area redevelopment will, to the extent practicable, follow the principles of a circular economy for procurement of services and operations of the site. A circular economy keeps materials, products, and services in circulation for as long as possible and aims to reduce material use and redesign materials, products, and services to be less resource intensive. A circular economy also recaptures “waste” as a resource to manufacture new materials and products (United States Environmental Protection Agency [USEPA] 2022).

Companies conducting businesses directly or indirectly with the NPS at Caneel Bay will be encouraged to create career development opportunities including management roles for Virgin Islanders. The NPS will seek to partner with a developer(s) that intends to work closely with the community and will prioritize a workforce of Virgin Islands residents as much as possible. This approach to the maximum extent practicable will be consistent with the NPS responsibility under the 1978 congressional mandate (16 USC 398(d)(b) and P.L. 95-348). The NPS will work with the developer to consider the need for additional employee housing and, if appropriate, will incorporate such housing into the developer’s redevelopment plans.

Commercial operations at the site will be conducted in a manner consistent with the NPS vision for long-term sustainable operations outlined in the Green Parks Plan (NPS 2016). From the Green Parks Plan, the NPS strives to align the NPS initiatives with EO 13693: *Planning for Federal Sustainability in the Next Decade* and related mandates. In December 2021, EO 14057: *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability* was signed and the NPS updated the Green Parks Plan to reflect more recent direction in this EO. The Green Parks Plan establishes goals to improve sustainability and reduce greenhouse gas emissions in the national park system. The goals most applicable to the Caneel Bay area operations include to continuously improve environmental performance, be climate friendly and climate ready; be energy smart; be water wise; adopt greener transportation methods; preserve outdoor experiences; buy green products; reduce, reuse, and recycle; and green our grounds. The NPS released the Third Edition of the Green Parks Plan in January 2023 (NPS 2023). The Green Parks Plan: Third Edition streamlines and consolidated the NPS goal areas within the plan, and this plan will be used as a guide for long-term sustainable operations within the Caneel Bay area. More information on the Green Parks Plan: Third Edition can be found on the NPS Green Parks webpage at [Green Parks Plan: Third Edition \(nps.gov\)](#).

Developers/operators will be selected through a competitive commercial services process by the NPS and an ability to meet the sustainability goals will be considered during evaluations. Visitor services, such as water sport rentals and food and beverage services, will be managed by the developer/operator or concessioner in areas designated by the NPS. Commercial operators will be responsible for designing and operating any on-site utility systems for the needs of the overnight lodging and amenities, including water, wastewater, power, security, and communications systems. Any new utility systems will use the existing footprint of the past resort utilities to the extent possible. The NPS will encourage sustainable

practices, such as the generation and use of renewable energy and the procurement and operation of energy efficient systems.

Commercial operations at the Caneel Bay area will be expected to contribute to the local economy of St. John by developing careers and providing local business opportunities. As part of any commercial operation at the site, the NPS will specify that developers/operators provide opportunities for local businesses and community engagement. Examples include a commitment to fair wages and employment for the residents of the US Virgin Islands; partnerships with local organizations, such as the University of the Virgin Islands for candidates in the hospitality and tourism management degree program; and opportunities for local artists and vendors to sell local goods at the site.

Rationale

The selected alternative best meets the purpose and need because it balances enhanced public access, recreational opportunities, resource protection, and Park operational efficiency while reestablishing an overnight experience on a portion of the original RUE that is consistent with the significant qualities of the historic district and designated historic landscape. The NPS utilized an interdisciplinary approach informed by the views of the public through civic engagement to develop the purpose and need statement for the EA. As stated in chapter 1 of the EA, action is needed to make the area accessible and welcoming to the local community, overnight lodging guests and Park visitors once the RUE expires, on September 30, 2023. After that date, all commitments and stipulations of the RUE are no longer in effect and the NPS will manage the site according to the NPS Organic Act, Management Policies and other relevant laws, regulations, policies, and guidance.

Changes to the Selected Alternative

The NPS added clarifications to some elements of the selected alternative but made no substantive changes. Minor edits and clarifications are included in Attachment A, Errata. The NPS adjusted the boundaries of the management zones (**Figure 1**) based on additional site information collected in November 2022 by the NPS to provide more context.

MITIGATION MEASURES

The NPS places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Therefore, the NPS will implement multiple mitigation measures and best management practices to protect natural, cultural, socioeconomic, and visitor experience. These measures and practices are described in detail on pages 19-23 of the EA and are hereby incorporated by reference. Mitigation measures were not needed to reduce impacts below a level of significance but do reduce impacts on Park resources as presented in chapter 3 of the EA.

The Final PA (Attachment C), will guide the implementation of the selected alternative and avoid, minimize, and mitigate effects on historic properties and is hereby incorporated by reference.

The NPS has the authority to implement the mitigation measures presented here under the Organic Act, The National Historic Preservation Act, NPS Management Policies 2006, and other federal and state applicable requirements.

SIGNIFICANCE CRITERIA REVIEW

Potentially Affected Environment

The potentially affected environment (or “study area” as described in the EA) includes the roughly 150-acre project area subject to the RUE as well as the surrounding areas, as shown in **Figure 1**. This boundary also is the area of potential effect for the purposes of the assessment of effects to cultural resources and consultation requirements under Section 106 of the NHPA, as amended (54 United States Code [USC] 306108). In the context of socioeconomic resources, the study area is expanded to include nearby areas such as Cinnamon and Trunk Bays located northeast of the Caneel Bay area, and in some cases the Park as a whole, where appropriate. Resources within the potentially affected environment that may be beneficially or adversely impacted include the Caneel Bay Historic District (historic district), floodplains, socioeconomic resources, and visitor use and experience.

Degree of Effects of the Action

The NPS considered the following actual or potential project effects in evaluating the degree of effects (40 CFR 1501.3(b)(2)) for this selected alternative.

(1) Beneficial and Adverse, and Short-term and Long-term Effects of the Selected Alternative

No significant impacts to resources were identified that would require analysis in an environmental impact statement (EIS). Whether taken individually or as a whole, the impacts of the selected alternative, including direct, indirect, and cumulative effects do not reach the level of a significant effect. The redevelopment of the Caneel Bay area as described in the Selected Alternative will result in both beneficial and adverse impacts. Construction activities associated with redevelopment such as removal of unsafe structures, repair and rehabilitation of the existing infrastructure, and replacement of buildings will have short term impact for the reasons noted below for each resource. Also, long-term impacts, those impacts occurring longer than construction, will occur from the use and operations of the site by the public and operators of the overnight lodging and other visitor services. Long-term describes the impacts that extend beyond the period of construction to implement such actions. In general, impacts both adverse and beneficial will be temporally distributed into the future. Best management practices and mitigation measures identified in the previous section will minimize any potential adverse impacts. Impacts associated with each resource follow.

Historic District

Management zoning and mitigation in the selected alternative were developed to ensure the protection of historic properties, including archeological sites. Future actions by the NPS or designee would be developed in consultation with the VI SHPO and other consulting parties according to the terms of the Section 106 PA. Implementation of the selected alternative will have an overall beneficial impact on the historic district as the NPS will stabilize, rehabilitate, preserve and/or adaptively reuse, where possible, existing structures, according to the Secretary of the Interior’s Standards for the Treatment of Historic Properties (36 CFR Part 68, 1995). In some instances, an adverse effect could occur to contributing resources to the historic district from the replacement or demolition of buildings to address safety issues or the relocation of a building to a more resilient area. With sufficient effort given to stabilization and ongoing maintenance, surviving historic properties can maintain their integrity of location, design, materials, and workmanship to the extent that those aspects of integrity currently remain. The selected alternative is not expected to change the NRHP eligibility for the historic district. Any removal/

demolition action associated with buildings or portions of buildings that are eligible for the NRHP will be conducted in consultation with the VI SHPO. The impacts will be noticeable as some of the buildings or structures will be impacted from the need for replacement or demolition to address safety issues, but the impacts will be small in scale as the 143.46-acre historic district has 109 contributing elements and the historic district will retain its integrity to the degree it will remain eligible for the NRHP. The selected alternative will return the site to its historical use that included overnight lodging, and restoring the site's setting and feeling. The selected alternative will allow for redevelopment in a manner consistent with its original design values to allow the sum of the contributing elements to convey the significance of the historic district. For these reasons, the EA documented no significant adverse impacts to the historic district.

Floodplains

Under the selected alternative, the rehabilitation or replacement of the Scott Beach and Hawksnest Beach North cottages will adversely impact the floodplain by continuing to include structures and impervious surfaces within the floodplain. This is not a substantial change from the current condition, as structures cover less than one acre (approximately 4%) of the floodplain within the project area. As such, the impacts will be small in scale in the context of the total floodplain footprint at the Park. By following the most up-to-date guidance on mitigation and minimization measures for structures in floodplains (National Flood Insurance Program's Floodplain Management Criteria for Flood Prone Areas [44 CFR 60.3]) that were not included in the design of the resort historically, there could be a long-term benefit to the floodplain by including temporary and removable structures, or elevating structures above the flood elevation. Additionally, the NPS will require that any developer/operator include a warning and evacuation plan for the floodplain area further reducing potential threats to human safety within the floodplain. The opportunity to incorporate practices to capture and treat stormwater will have a beneficial impact on water quality through a reduction of stormwater runoff resulting in sedimentation into the marine environment, as described in the EA (page 14).

Overall, because impacts to the floodplain are small in scale in the context of the total floodplain footprint within the Park, the EA found no significant adverse impacts to floodplains.

Socioeconomic Resources

The overall effect on socioeconomics because of the selected alternative, as compared to post-hurricane conditions, will be beneficial. The reestablishment of an overnight guest experience with up to 166 guest rooms with supporting amenities will provide economic benefits to the US Virgin Islands by providing a return of visitor opportunities and spending in the territory, increased career development at the site, and opportunities for local businesses to contribute to the operation of the Caneel Bay area. The overnight lodging and amenities also will serve as a model for sustainable management practices that participate in a circular island economy, as described in the *Selected Alternative* section of this FONSI, for procurement of services and operations of the site.

The selected alternative will also provide an opportunity—through a partnership—for a community organization(s) to jointly operate a community center, heritage center, or amphitheater for cultural events, educational programs, and other activities. This community area can be developed in a manner that will enhance the guest experience at the Caneel Bay area, as well as benefit the local community. Through partnerships with a local school and/or community group to provide a cultural experience for

Virgin Islanders and visitors, this designated community area will have a beneficial effect on the socioeconomics of the local community from increased spending associated with the resumption of day-use public visitation from other amenities that will be available at the Caneel Bay area (e.g., rentals, food and beverage services).

In future commercial use planning processes, the RFP will seek ideas from developers to guide redevelopment following the objectives and prescribed conditions under the selected alternative. However, there will be the opportunity for additional criteria to be included in the RFP, where appropriate. The RFP will encourage developers to employ Virgin Islanders at every level of the operations and management and to procure supplies and services from local businesses and vendors as much as possible. This approach will include the use of Virgin Islanders for the workforce to the maximum extent practicable consistent with the NPS responsibility under the 1978 congressional mandate (16 USC 398(d)(b) and P.L. 95-348). To address housing shortages on St. John, the NPS will work with the developer to consider the need for additional employee housing and, if appropriate, will incorporate such housing into the developer's redevelopment plans.

Overall, the EA found no significant adverse impacts to socioeconomic resources.

Visitor Use and Experience

The selected alternative will result in an overall benefit to Caneel Bay area user groups by offering a variety of the visitor uses and experience that are currently not offered at the site, as well as provide a greater opportunity for visitors and guests to learn about St. John's local history through interpretation of cultural sites, including the archaic, colonial, and post-emancipation era sites. The selected alternative also will improve access for all Caneel Bay area users (residents, guests, and visitors of the Park) and increase NPS presence in select areas—like other areas of the Park—to assist in site interpretation, wayfinding, and general orientation.

The selected alternative provides enhanced public access, recreational opportunities, and resource protection while reestablishing an overnight experience at the Caneel Bay area. As such, visitors looking for varying uses and experiences can benefit from redevelopment activities. For example, visitors looking to connect with the natural areas of the Park will be able to do so via trails and pedestrian access on some existing roads throughout the Caneel Bay area. Visitor experience will be a key consideration in the RFP development and future redevelopment plans in coordination with the NPS. The selected alternative likely will result in a return of visitation to Caneel Bay. The Caneel Bay area will offer recreation areas that are accessible to visitors and barrier free, which is limited outside the Park.

The management zones (**Table 1**) help accommodate different visitor uses and experiences such as overnight lodging, day-use at beaches, interpretive opportunities, and outdoor recreational experiences, specific benefits of which are outlined in the EA. The overnight experience will be commensurate of a twenty-first century eco-resort consistent with the past uses of the site. The developer/operator will be responsible for sustainable operations, with the goal of maintaining an acceptable level of use to manage impacts of overcrowding. The total number of guest rooms will not exceed 166. Based on the anticipated types of visitor services to be provided for overnight guests, impacts to visitor use and experience specific to overnight guests will be beneficial.

Overall, the EA did not identify significant adverse impacts to visitor use and experience and will improve the visitor experience at the Park.

(2) The degree to which the proposed action affects public health or safety.

The facilities at that resort that were damaged by the 2017 hurricanes pose safety concerns such as unstable structures and building debris. Public access to the resort is currently prohibited by the RUE holder, and most areas are fenced off with “No Trespassing” signs installed notifying visitors of the unsafe conditions. Under the selected alternative, the NPS will identify a management approach (such as stabilization or removal of buildings) to address unsafe conditions and restore public access.

Risks to human health and safety associated with replacement of structures in floodplains will be minimized by emergency planning and conditions to the commercial services contract for temporary occupancy of these facilities. The weather and storm conditions that lead to high water events, including the scope and duration of these events on St. John, are known by Park staff. For hurricanes and tropical storms, ample notice of severe weather is provided by the National Weather Service and other agencies, making warning and evacuation a practical option for protection of human life in the areas with temporary occupancy (lodging) at the Caneel Bay area. The Park will maintain an active hurricane evacuation plan that will detail responsibilities of individual Park employees for advanced preparedness measures at the onset of the hurricane season. Actions taken under a severe weather emergency action plan (SWEAP) that affect an operator will be communicated to the operator in advance. Additionally commercial operations may be required to develop and implement a SWEAP for the protection of staff, guests, and assets under their management.

Prior to the redevelopment activities and the affected area being opened for public use, the following actions will occur as part of the ongoing cleanup based on the findings of the Engineering Evaluation and Cost Analysis (EE/CA), EE/CA Addendum and Action Memos. Contaminated soils in the Maintenance, Landscaping, and Fueling area will be removed and legally disposed of off-site. These soils will be replaced with clean fill. The landfill adjacent to Honeymoon Beach will be fully removed. The site will be restored to its original topography and reseeded with native vegetation. Asbestos-containing debris, as described in the EE/CA Addendum, will be removed and disposed off-site. In all cleanup actions, the NPS will comply with the substantive requirements of all applicable or relevant and appropriate requirements regarding air emissions, site disturbance, erosion controls, legal disposal of waste, and other laws.

Any hazardous waste materials identified for disposal will be transported to the Continental US for proper, legal disposal, as the landfills on St. John and St. Thomas are not permitted to receive hazardous waste. If the local landfills will not accept the non-hazardous contents of the landfill in the Caneel Bay area, the NPS is prepared to send such material off-island for disposal, thereby minimizing impacts to local, USVI landfills, which have limited capacity.

All waste generated within the Caneel Bay area will be disposed of in accordance with territory and federal regulations. The NPS expects response actions to address site contamination (ACM debris removal, landfill removal, contaminated soil removal) will be implemented within the next year. The NPS is currently evaluating funding options to implement the selected response actions, should the Potentially Responsible Parties not voluntarily agree to complete environmental site cleanup activities in a timely fashion.

(3) Effects That Would Violate Federal, State, Tribal or Local Law Protecting the Environment

The selected alternative does not threaten or violate applicable federal, state, or local environmental laws or requirements imposed for the protection of the environment. On February 1, 2022, the NPS hosted an agency meeting with participants from VI DPNR's Coastal Zone Management Division and Water Pollution Division, the National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries), US Fish and Wildlife Service (USFWS), and the VI SHPO. At this meeting, the NPS presented an overview of the plan and presented preliminary alternatives that were being considered.

On January 20, 2023, the NPS formally requested consultations with the USFWS and NOAA Fisheries on the proposed action/NPS preferred alternative (Alternative B) as described in the EA, as well as concurrence with NPS determinations on federally listed species and their critical habitats. The NPS received letters of concurrence on all threatened and endangered species determinations (either 'no effect' or 'may affect, not likely to adversely affect') from the USFWS on January 31, 2023 and from NOAA Fisheries on June 29, 2023. In addition, NOAA Fisheries responded to the NPS in a separate letter dated June 30, 2023 pertaining to future steps with development of conservation measures specific to turbidity standards and erosion control to ensure protection of Essential Fish Habitat (EFH). In this letter, NOAA Fisheries reiterated that the EA represents a planning document in the early redevelopment stage and, therefore, expects the NPS to reinitiate consultation once site-specific plans are developed. NOAA Fisheries noted that no further coordination on EFH is needed for the EA.

On June 8, 2022, the Park hosted a virtual meeting with the VI SHPO. The purpose of this meeting was to discuss a forthcoming submittal on Steps 1 and 2 of the Section 106 process and overall project approach. The VI SHPO agreed in principle to initial NPS findings, the need for a flexible approach and affirmed a commitment to ongoing consultation. The documentation for consultation along with a finding was transmitted to VI SHPO on June 14, 2022. On July 5, 2022, VI SHPO concurred with the finding and the NPS commitment to continue consultation with VI SHPO, consulting parties, and the public to assess effects and resolve any adverse effects through the development and execution of a complex project PA pursuant to 36 CFR 800.14(b). A draft PA was submitted to the VI SHPO on October 28, 2022 and provided as an attachment to the EA for public review on January 20, 2023. The final PA was reviewed by VI SHPO and signed by all affected parties by June 22, 2023 and is included as Attachment C.

FINDING OF NO SIGNIFICANT IMPACT

Based on the information contained in the EA, I have determined that the selected action does not constitute a major federal action having a significant effect on the human environment. Therefore, an EIS will not be required.

This finding is based on consideration of CEQ criteria for significance (40 CFR 1501.3 (b)), regarding the potentially affected environment and degrees of effects of the impacts described in the EA.

REFERENCES

Jaeger, D. and B. Labrie

- 2012 Caneel Bay Historic District. *National Register of Historic Places Registration Form*. The Jaeger Company, Gainesville, Georgia.

National Park Service (NPS)

- 2015 National Park Service NEPA Handbook.
- 2016 Green Parks Plan, Advancing Our Mission Through Sustainable Operations, National Park Service, US Department of the Interior. Spring 2016. 6 pp.
- 2023 Green Parks Plan: Third Addition, Advancing the National Park Service Mission Through Sustainable Operations, National Park Service, US Department of the Interior. January 2023. 14 pp.

US Environmental Protection Agency (USEPA)

- 2022 What Is a Circular Economy? National Recycling Strategy. Available Online: <https://www.epa.gov/recyclingstrategy/what-circular-economy>. Accessed October 6, 2022. Last updated September 29, 2022.

APPENDIX A: ERRATA INDICATING TEXT CHANGES TO THE ENVIRONMENTAL ASSESSMENT

INTRODUCTION

This errata documents changes (corrections and minor revisions) to the text of the environmental assessment (EA) as a result of comments received on the EA during the public review process, as well as other corrections.

Page numbers referenced pertain to the *Caneel Bay Area Redevelopment and Management Environmental Assessment* released to the public for review on January 20, 2023. Original text from the EA is included to provide context and to allow for comparison to the text change. Additions to text are underlined, and deleted text is shown by ~~strikeout~~.

ERRATA

Page 12

Visitors would be provided an overnight experience commensurate with the ~~Laurance Rockefeller's vision~~ storied legacy and site history of Caneel Bay.

Page 14

Each structure ~~would~~ could be outfitted with roof catchment and water treatment capabilities.

Page 14

Under Alternative B, the NPS would work with one or more developer/operator to create an overnight visitor experience that ~~represents~~ is mindful of the design intent of the resort from the mid-twentieth century.

Page 15

The layout of the buildings was intended to produce a “harmonious unity” with the site and landscape. ~~Laurance Rockefeller also had a desire to not increase the capacity of the resort.~~ All overnight lodging concepts proposed by a developer/operator would not exceed previous lodging capacity of approximately 166 guest rooms.

Page 15

Based on public comments received during civic engagement in April 2021 and January through March 2022, the NPS has identified two potential areas at the Caneel Bay area for future community spaces (**Figure 4**), including one with low topographic relief (flat) close to the entrance roadway and another area near Little Caneel Beach closer to the water.

Page 15

If an opportunity affords, the NPS would work with a partner to fund and operate the community space. Like other aspects of the redevelopment, the exact location, size, need and use for the two areas are unknown at this time and additional site-specific compliance would be completed before implementation. The NPS would determine the appropriate mix of community and commercial space based on a number of factors, including, but not limited to: responses to requests for expressions of interest, interpretive needs of the park, and the financial ability of community groups to finance and

develop community spaces. If no partner is identified to fund or operate the community space, the NPS or developer would utilize the space consistent with the desired condition of the zone.

Page 16

~~Local businesses of the Companies conducting business directly or indirectly with the NPS at the Caneel Bay area would be encouraged to create meaningful employment career development opportunities such as creating management roles for local residents Virgin Islanders. The NPS would seek to partner with a developer(s) that intends to work closely with the community and would prioritize a workforce from the local community of Virgin Island residents as much as possible. This approach, would include the use of Virgin Islanders for the workforce to the maximum extent practicable consistent with the to the maximum extent practicable, would be consistent with the NPS responsibility under the 1978 congressional mandate (16 USC 398(d)(b) and P.L. 95-348). The NPS would work with the developer to consider the need for additional employee housing and, if appropriate, would incorporate such housing into the developer's redevelopment plans.~~

Page 16

More information on the Green Parks Plan can be found on the NPS Green Parks webpage at <https://www.nps.gov/subjects/sustainability/upload/NPS-Green-Parks-Plan-2016.pdf>
<https://www.nps.gov/subjects/sustainability/upload/NPS-Green-Parks-Plan-Third-Edition.pdf>

Page 16

The NPS would encourage sustainable practices, such as the generation and use of renewable energy and the procurement and operation of energy efficient systems and electric vehicles.

Page 16

Commercial operations at the Caneel Bay area would be expected to contribute to the local economy of St. John by creating jobs developing careers and providing local business opportunities.

Page 42

Adding seven beaches for public use could result in ~~increased a return of~~ visitation to the island with more beaches available to the public, resulting in a small and limited beneficial impact on the socioeconomics of the island.

Page 42

Adding an additional seven beaches for public access could ~~increase return day-use public~~ visitation to the island but it is not expected to measurably impact the socioeconomics of the island.

Page 43

The redevelopment of lodging and amenities and restoring access to the Caneel Bay area would provide economic benefits stimulus to the local community US Virgin Islands through increased ~~visitation to the island opportunities for the use of the site,~~ increased access to employment career development at the site, and opportunities for local businesses to contribute to the operation of the Caneel Bay area.

Page 43

Through partnerships with a local school and/or community group to provide a cultural experience for St. John's local population and visitors, this designated community area would have a long-term beneficial effect on the socioeconomics of the local community from increased spending associated with ~~increased day-use public~~ visitation from the cultural experience and special events that would be

available at the Caneel Bay area (i.e., e.g., rentals, food and beverage services). ~~In addition, the existing water treatment plant facilities at Caneel Bay would continue to operate and provide clean water to the local community. If a partner is not identified to fund or operate a community space, the NPS would determine how the area would be managed into the future and further evaluation would be conducted and these benefits may not be realized.~~

Page 44

Alternative B provides economic benefits to the local community through ~~increased~~ a return of visitation to the island, increased access for employment at the site, and opportunities for local businesses to contribute to the operation of the Caneel Bay area.

Page 44

When compared to Alternative A, Alternative B would benefit socioeconomics through the establishment of the overnight lodging experience and supporting amenities that would bring back to the region the economic benefits of ~~increased visitation~~ a return of visitor opportunities, increased employment, and opportunities for local businesses.

Page 54

NPS 2023

Green Parks Plan: Third Edition, Advancing The National Park Service Mission Through Sustainable Operations, National Park Service, US Department of the Interior. January 2023.

Page B-10

The proposed action would have a greater economic benefit than existing conditions by increasing opportunities for employment and opportunities for local businesses through ~~increased~~ the resumption of visitation to St. John and partnerships with the Caneel Bay area commercial service providers.

Page B-10

The redevelopment could ~~increase~~ return visitation to the Park and could result in visitors extending their stay at the Park.

ATTACHMENT B: DETERMINATION OF NO IMPAIRMENT

The National Park Service (NPS) Organic Act of 1916 directs the NPS to "conserve the scenery, natural, and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 USC 100101). NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the "particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

Resources that were carried forward for detailed analysis in the Caneel Bay Area Redevelopment and Management Environmental Assessment (EA), and for which a non-impairment determination has been made, include the Caneel Bay Historic District (historic district), floodplains, and socioeconomic resources. A non-impairment determination is not necessary for visitor use and experience because this impact topic is not generally considered a park resource or value subject to the non-impairment standard (see NPS 2006, Section 1.4.6).

HISTORIC DISTRICT

As described in the Caneel Bay Area Redevelopment and Management Finding of No Significant Impact (FONSI), the selected alternative may result in adverse impacts to contributing resources of the historic district, for example, from removal of buildings that cannot be rehabilitated or repurposed. However, the selected alternative would not impact the historic district to a degree that would make it ineligible for the National Register of Historic Places (NRHP). Existing buildings and infrastructure would be stabilized, rehabilitated, preserved and/or adaptively reused, where possible, according to the Secretary of the Interior's Standards. Site-specific analysis would be conducted to assess the historic integrity and structural integrity of each resource before any preservation or rehabilitation actions would occur.

Some of the buildings or structures could be beyond repair and would need to be demolished, such as the Scott Beach Cottages.

Changes to the historic landscape also could occur depending on design plans developed by an operator in coordination with the NPS and the US Virgin Islands State Historic Preservation Office (VI SHPO). However, the management zones defined as a part of the selected alternative, as described in the FONSI, were purposely designed to avoid and minimize effects on the cultural landscape and archeological sites, as well as to ensure NRHP-eligible sites would be kept under NPS management control. High potential areas would be protected in the Conservation Zone, as described in the EA, where no new development would occur. In addition, this undertaking would be subject to the PA developed concurrently with the EA outlining the National Historic Preservation Act (NHPA) Section 106 consultation process. Detailed resource specific commitments related to resource avoidance, minimization, and mitigation would be further refined during the design phase in coordination with the VI SHPO and developer and implemented as part of the undertaking, as described in the Programmatic Agreement (PA; FONSI, Attachment C). For these reasons, the NPS has determined that the selected alternative will not result in impairment of the historic district.

FLOODPLAINS

As described in the EA, replacement or reconstruction of the cottages at Scott Beach or Hawksnest Beach North will displace a small volume of flood waters and affect floodplain functions and values, primarily water storage. Ground disturbance during construction, although expected to be small (i.e., structures cover less than one acre [approximately 4%] of the floodplain within the project area), could impact the floodplain by exposing soils. However, this would be minimized through erosion and sediment control measures during construction and staging construction materials outside the floodplain. Due to the location along the coast, the changes in water flow or available water storage would be small in the context of the size of the floodplain. For these reasons, the NPS has determined that the selected alternative will not result in impairment of floodplains.

SOCIOECONOMIC RESOURCES

As described in both the EA and FONSI, the selected alternative benefits socioeconomics through the establishment of the overnight lodging experience and supporting amenities that will bring back to the region the economic benefits of a return of visitor opportunities, increased employment, and opportunities for local businesses. The redevelopment of the Caneel Bay area to include lodging and visitor amenities will immediately create a substantial number of construction jobs, along with opportunities for ancillary trade and wholesale businesses in the USVI. The redevelopment of lodging and amenities and restoring access to the Caneel Bay area will provide economic benefits to the local community through the return of visitation to the island, increased access to employment at the site, and opportunities for local businesses to contribute to the operation of the Caneel Bay area. In addition to lodging and employment, opportunities for a designated space for a community area could be provided. Through a partnership, the Park and the local community could operate a community center, heritage center, or amphitheater, for cultural events, education programs, and other activities. This community area can be developed in a manner that would enhance the guest experience at the Caneel Bay area, as well as benefit the local community. Through partnerships with a local school and/or community group to provide a cultural experience for St. John's local population and visitors, this designated community area will have a beneficial effect on the socioeconomics of the local community from increased spending associated with the resumption of day-use public visitation from other amenities that will be available at the Caneel Bay area (e.g., rentals, food and beverage services).

In future commercial use planning processes, the request for proposal (RFP) will seek ideas from developers to guide redevelopment following the objectives and prescribed conditions under the selected alternative. However, there would be the opportunity for additional criteria to be included in the RFP, where appropriate. The RFP will encourage developers to employ Virgin Islanders at every level of the operations and management and to procure supplies and services from local businesses and vendors as much as possible. This approach will include the use of Virgin Islanders for the workforce to the maximum extent practicable consistent with the NPS responsibility under the 1978 congressional mandate (16 USC 398(d)(b) and P.L. 95-348). To address housing shortages on St. John, the NPS will work with the developer to consider the need for additional employee housing and, if appropriate, will incorporate such housing into the developer's redevelopment plans. For these reasons, the NPS has determined the selected alternative will not result in impairment of socioeconomic resources.

SUMMARY

The NPS has determined that implementation of the selected alternative will not constitute impairment of the resources of the Park. This conclusion is based on consideration of the Park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and others, and the professional judgement of the decision maker guided by the direction in NPS Management Policies 2006.

REFERENCES

National Park Service

- 2006 NPS Management Policies 2006. Available online at: https://www.nps.gov/subjects/policy/upload/MP_2006.pdf.

**PROGRAMMATIC AGREEMENT
BETWEEN THE
NATIONAL PARK SERVICE
AND
THE VIRGIN ISLANDS STATE HISTORIC PRESERVATION OFFICE
REGARDING
THE CANEEL BAY AREA REDEVELOPMENT AND MANAGEMENT PLAN
ST. JOHN, VIRGIN ISLANDS**

WHEREAS, the National Park Service (NPS) Virgin Islands National Park (VIIS, the Park), as the lead federal agency, has begun the planning process for the redevelopment and management of the Caneel Bay area to identify a sustainable and resilient redevelopment strategy and management plan, the Caneel Bay Area Redevelopment and Management Plan (the Plan), that preserves and protects its cultural and natural resources, provides a range of visitor experiences and promotes economic activities that integrate the values and history of the community of St. John, and addresses resource concerns following two Category 5 hurricanes (Irma and Maria) in 2017; and

WHEREAS, in 1983 Caneel Bay Resort owners (Jackson Hole Preserve, Incorporated) donated the 150-acre Caneel Bay Resort to NPS, but required it be subject to an indenture agreement known as a Retained Use Estate (RUE) that allows its owner to utilize the property until September 30, 2023; and

WHEREAS, NPS does not have access rights to the improvements/property under the terms of the RUE until September 30, 2023; and

WHEREAS, since the current condition of historic properties are unknown and specific effects of the undertaking will not be known until full, unencumbered access to Caneel Bay is achieved following the expiration of the RUE, NPS has elected to comply with Section 106 through the execution and implementation of a Programmatic Agreement (PA) under 36 CFR 800.14(b) to clarify the procedures for identifying historic properties, determining the level of effect on those properties, and, if needed, develop strategies to avoid, minimize, or mitigate adverse effects; and

WHEREAS, NPS has determined that the implementation of this plan will result in undertakings that may affect properties included in or eligible for the National Register of Historic Places (NRHP) and has consulted with the Virgin Islands State Historic Preservation Office (VISHPO), pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. §306108; Attachment A); and

WHEREAS, pursuant to 36 CFR 800.2(c)(2), NPS has confirmed that there are no federally recognized Indian Tribes with an interest in the Virgin Islands that attach religious and cultural significance to historic properties that may be affected by the undertaking; and

WHEREAS, NPS has defined the undertaking's area of potential effects (APE) as the 150-acre RUE lease area to account for all possible effects on historic properties (36 CFR 800.4(a)); and

WHEREAS, NPS found the Caneel Bay Historic District to be eligible for the NRHP in consultation with the Virgin Islands State Historic Preservation Office (VISHPO) in 2012; and

WHEREAS, NPS has found in consultation with VISHPO that there are significant recorded and previously unrecorded archeological resources and above-ground historic properties contributing to the Caneel Bay Historic District present in the APE (36 CFR 800.4(c)(2)); and

WHEREAS, NPS has consulted with Territorially Recognized Guainía Taino Tribe of the Virgin Islands, St. John Historical Society, Island Green Living Association, StJanCo: The St. John Heritage Collective, Friends of Virgin Islands National Park, St. John Community Foundation, St. John School of the Arts, and the local and territorial government regarding the potential effects of the undertaking on historic properties; and

WHEREAS, pursuant to 36 CFR 800.6(a)(1), NPS has notified the Advisory Council on Historic Preservation (ACHP) of this PA, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR 800.6(a)(1)(iii); and

WHEREAS, NPS has provided for public involvement in the development of this PA concurrently with the development of an environmental assessment (EA) pursuant to the National Environmental Policy Act (NEPA);

NOW, THEREFORE, NPS and the VISHPO agree that the undertaking shall be implemented in accordance with the following stipulations to take into account the effects of the undertaking on historic properties.

STIPULATIONS

NPS shall ensure that the following stipulations are implemented:

I. ARCHEOLOGICAL RESOURCES

A. Identification

NPS shall ensure that an archeological survey is conducted for all areas within the APE where there may be any ground disturbance and that the work is conducted in a manner consistent with the *Secretary of the Interior's Standards and Guidelines for Identification* (48 FR 44720-23) and considering the National Park Service's publication *The Archeological Survey: Methods and Uses* (1978: GPO stock #024-016-00091) and VISHPO guidance. The survey(s) will summarize past archeological investigations and will be conducted in consultation with the VISHPO. A research design, work plan, and scope of work for the Phase I archeological survey will be developed and submitted to the VISHPO for review and comment before the commencement of any work. Phase I management reports and Phase II workplans (if necessary) will be submitted to the VISHPO after the Phase I survey for review and comment. Revisions to Phase II work plans shall be developed in consultation with the VISHPO and submitted to the VISHPO

for review and comment.

B. Evaluation

All archeological resources identified in the APE will be evaluated in accordance with 36 CFR 800.4(c). After the completion of any Phase II evaluation investigations, the VISHPO shall be provided with an interim site report discussing the eligibility of the resources, project effects, and proposed mitigation measures (if necessary). The interim report shall be submitted to the VISHPO for review and comment within three months of the completion of fieldwork.

C. Avoidance and Mitigation

NPS will make reasonable effort to avoid the extensive archaeological resources found eligible in the APE and any additional resources that are identified during a Phase II investigations. If the resources cannot be avoided and the effect will be adverse, mitigation plans will be developed on a site-by-site basis in consultation with VISHPO and any other appropriate parties. If the Phase II investigation results in the identification of resources that are eligible only for the information that they may contain, NPS shall ensure that they are treated in accordance with Stipulation I.D below. If the investigation results in the identification of an archeological resource eligible for any other reason, NPS shall comply with 36 CFR 800.5.

D. Data Recovery Plans

If needed, and if an adverse effect is not avoidable, for each adversely affected site that is eligible only for the information that it contains, NPS shall ensure that a data recovery plan is developed in consultation with the VISHPO. The data recovery plan will be consistent with the *Secretary of the Interior's Standards and Guidelines for Archeological Documentation* (48 FR 44734-37), NPS Southeast Archeological Center (SEAC) standards and guidelines, will consider the ACHP publication *Treatment of Archeological Properties* (1980), and in consideration of the VISHPO guidance. It shall specify, at a minimum:

1. Research questions to be addressed through the data recovery, with an explanation of their relevance and importance;
2. Methods to be used, with an explanation of their relevance to the research questions;
3. Proposed disposition of recovered materials and records;
4. Proposed methods for disseminating the results to the public.
5. NPS shall ensure that the data recovery plan is submitted to consulting parties for a thirty (30) day review. Unless a consulting party objects within thirty (30) days after the receipt of the data recovery plan, NPS shall ensure that it is

implemented. The parties to this agreement shall consult and resolve any objections as specified in Stipulation VI, below.

E. Curation

All records and materials resulting from the archeological investigations will be curated in accordance with 36 CFR 79 and the curation guidelines outlined in NPS policy. NPS shall ensure that all artifacts and materials excavated are curated at the park.

F. Reports

NPS shall ensure that all final archeological reports resulting from actions under this Agreement will be provided to the consulting parties for review and comment. A management summary will be completed and submitted within six months of the completion of fieldwork and a final report within 24 months. Anticipated reports include a Phase I or combined Phase I/Phase II archeological survey report and a series of individual Phase III data recovery reports, if necessary. The reports shall meet professional standards set forth by the Department of the Interior's *Format Standards for Final Reports of Data Recovery Program* (42 FR 5377-79) and will be prepared in accordance with NPS and VISHPO standards and guidelines.

G. Treatment of Human Remains

Each data recovery plan will discuss the procedures to be followed if human remains are encountered during the archeological investigations. The data recovery plan shall include the process of notification of associated Native American groups and treatment of the human remains. NPS shall ensure that any human remains, and grave-associated artifacts encountered during the archeological investigations are brought to the attention of the consulting parties within 24 hours of discovery. No activities which might disturb or damage the remains will be conducted until all parties have determined whether excavation is necessary and/or desirable. All procedures will follow the guidance outlined in the National Park Service Publication *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places*, the Native American Graves Protection and Repatriation Act of 1990 (PL 101-601), and the VISHPO guidance for the Treatment of Burials and Human Remains.

II. HISTORIC RESOURCES

A. Identification

NPS will follow 36 CFR 800.4(b)(2) for the phased identification and evaluation to account any previously unidentified historic properties and assess the integrity of above-ground historic properties since the Caneel Bay Historic District was determined eligible for the NRHP in 2012.

B. Evaluation

NPS will follow 36 CFR 800.4(c) to evaluate historic significance and determine if previously identified historic structures still retain integrity following the 2017 hurricanes. Ongoing consultation will occur with the VISHPO and other interested parties to come to a determination on eligibility for structures within the APE.

C. Structural Integrity Reviews

NPS will retain an engineer to prepare a structural review of historic buildings that are considered National Register-eligible or contributing to the Caneel Bay Historic District to determine their potential for stabilization, rehabilitation, and adaptive reuse. These evaluations will provide NPS with the necessary information regarding the feasibility of adaptive reuse of existing facilities and aid in the consultation effort with the VISHPO, affected parties, and the public.

D. Adverse Effects

The NPS has and will continue to advocate for avoidance and minimization of effects to historic properties. However, in the event adverse effects cannot be avoided, NPS will continue consultation with the VISHPO, consulting parties, and the public to assess effects by applying the criteria of adverse effect (36 CFR 800.5(a)1) to the resources identified and continue to consult with consulting parties and the public to resolve any adverse effects to historic properties (36 CFR 800.6(a)). Potential mitigation measures in future negotiations could include, but is not limited to:

1. Updating the NRHP Registration Form and pursuing nomination to the NRHP of the Caneel Bay Historic District.
2. Developing design guidelines to be used during the redevelopment process that would guide preservation and rehabilitation.
3. Preparing Historic American Buildings Survey/Historic American Landscapes Survey (HABS/HALS) documentation if determined necessary.
4. Developing interpretive displays or markers to provide information on the history and various significant resources, including archaeological resources and historic resources.

E. Reports

NPS shall ensure that the final reports resulting from actions pursuant to this Agreement will be provided to the consulting parties for review and comment. All final reports will be completed and submitted to consulting parties within 24 months of the completion of fieldwork. The reports shall meet professional standards and will be prepared in accordance with NPS and VISHPO standards and guidelines.

III. POST-REVIEW DISCOVERIES

NPS shall ensure that any post-review archeological resources discovered during

construction will be treated in accordance with 36 CFR 800.11(b)(2) and follow the protocol listed in the following paragraphs:

- A. Construction activities in the immediate area will cease and the contractor shall notify NPS immediately to evaluate the find.
- B. If needed, NPS will contact the VISHPO to conduct a joint field review within 24 hours of the initial notification.
- C. If data recovery is warranted and agreed upon by all parties, a data recovery plan shall be submitted by NPS within three working days to the consulting parties for concurrent review. Unless a consulting party objects within three working days after receipt of the data recovery plan, NPS shall ensure that it is implemented.

IV. PERSONNEL QUALIFICATIONS

NPS shall ensure that all work carried out pursuant to this agreement is carried out by or under the direct supervision of a person or persons meeting at a minimum the Secretary of the Interior's Professional Qualifications Standards for Historic Preservation (48 FR 44738-9).

V. MONITORING AND REPORTING

Following the execution of this PA until it expires or is terminated, NPS shall provide all parties to this PA a summary report detailing work undertaken pursuant to its terms annually. Such reports shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in NPS's efforts to carry out the terms of this PA.

VI. DISPUTE RESOLUTION

Should any signatory to this PA object in writing to NPS regarding any action proposed or carried out concerning the undertaking or implementation of this PA, NPS shall consult with the objecting party to resolve the objection. If NPS determines that the objection cannot be resolved, NPS will:

- A. Forward all documentation relevant to the dispute, including NPS's proposed resolution, to the ACHP. The ACHP shall provide NPS with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, NPS shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. NPS will then proceed according to its final decision.

- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30)-day time period, NPS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, NPS shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the PA and provide them and the ACHP with a copy of such written response.
- C. NPS's responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

VII. AMENDMENT

This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

VIII. TERMINATION

If NPS determines that it cannot implement the terms of this PA, or if a consulting party determines that the PA is not being properly implemented, they may propose to the other parties to this PA that it be terminated. The party proposing to terminate this PA shall so notify all parties to this PA, explaining the reasons for termination and affording them at least 30 days to consult and seek alternatives to termination.

Should such consultation fail, the ACHP will be consulted to provide a recommended solution. Should this PA be terminated, NPS shall either:

- A) Consult in accordance with 36 CFR 800.6(c)(1) to develop a new PA; or
- B) Request the comments of ACHP pursuant to 36 CFR 800.7(a).

This PA will terminate 10 years from the date of execution unless consulting parties agree to extend the duration of the agreement.

Execution of this PA by NPS and the VISHPO, and implementation of its terms, are evidence that NPS has allowed the VISHPO to comment on the Plan and that NPS has considered the effects of the undertaking on historic properties.

NATIONAL PARK SERVICE

By:  Date: June 22, 2023
Title: Superintendent, Virgin Islands National Park

VIRGIN ISLANDS STATE HISTORIC PRESERVATION OFFICE

By:  _____ Date: 06-June-2023
Title: Virgin Islands State Historic Preservation Officer

ATTACHMENTS

- A. Section 106 Steps 1 and 2 Documentation

**National Park Service
US Department of the Interior**

**Virgin Islands National Park
US Virgin Islands**



Public Involvement Comment Response Report

*Virgin Islands National Park Caneel Bay Area Redevelopment and
Management Environmental Assessment*

July 2023

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PUBLIC INVOLVEMENT COMMENT RESPONSE REPORT

INTRODUCTION

The National Park Service (NPS) prepared an environmental assessment (EA) to examine alternative actions and environmental impacts associated with the redevelopment and management of the Caneel Bay area at Virgin Islands National Park (the Park). Action is needed to address ongoing cultural and natural resource impacts associated with the 2017 hurricanes (Irma and Maria) and to integrate the Caneel Bay area into the overall management of the park. This integration includes making the area accessible and welcoming to the local community, overnight lodging guests, and park visitors once the Retained Use Estate (RUE) expires on September 30, 2023. The purpose of the action is to identify a sustainable and resilient redevelopment strategy for the Caneel Bay area that (1) integrates the value and history of the community of St. John; (2) preserves and protects its significant cultural and natural resources; (3) provides a range of visitor experiences, including overnight and day-use opportunities; and (4) promotes economic activities.

In January 2023, the NPS notified the public of the availability of the Caneel Bay Area Redevelopment and Management EA for public review and comment. The NPS closely reviewed and discussed all comments submitted and those comments provided by the public during the various public meeting held in January, February, and March of 2023.

This report presents the analysis and summary of public comments received during the 2023 public comment period on the EA for the redevelopment and management of the Caneel Bay area. This document provides a summary of the concerns and ideas expressed during the public comment period and the NPS' response to each concern or idea. Public comments obtained from this process were gathered, organized, and analyzed using the NPS Planning, Environment, and Public Comment (PEPC) web-based tool. Written or oral comments received at the public meetings were entered into PEPC and included in this analysis. The next step in the process is to prepare the NPS decision document and, if appropriate, conclude that the selected alternative would not result in significant adverse impacts.

PUBLIC INVOLVEMENT OUTREACH

The NPS held a public comment period for the Caneel Bay Area Redevelopment and Management EA from January 20, 2023 to March 6, 2023 (a 45-day comment period). The public was invited to review and comment on the EA using PEPC or by mailing written comments as well as afforded an opportunity to comment during the public meetings. The following summarizes the NPS efforts to engage the public and encourage public comment during this process.

On January 20, 2023, the NPS issued a press release announcing the public comment period and planned public meetings. This press release was posted to the NPS Caneel Bay Redevelopment webpage on PEPC and published in local, high-circulation publications, including the Virgin Islands Daily News, VI Source and the VI Consortium. The NPS posted the announcement on social media and updated the Park's website with information on the public comment period. The newsletter and EA were posted to PEPC. The newsletter and press release were distributed to the Park's mailing list, which included local non-governmental organizations (NGOs), government officials, consulting agencies, commercial use

authorization (CUAs) holders, and approximately 1,000 citizens. These newsletters were also provided by email and each organization was encouraged to share the newsletters with their members.

From late January to early March 2023, the NPS hosted a series of meetings to reach a wide array of interested stakeholders and the general public as detailed below.

- **Virtual Public Meeting** - On January 26, 2023, the NPS hosted a virtual public meeting that included 84 participants.
- **In-Person Public Meeting #1** - On February 2, 2023, the NPS hosted a meeting at the Giff Hill School Atrium in Cruz Bay, St. John that included 31 participants.
- **In-Person Public Meeting #2** - On February 4, 2023, the NPS hosted a meeting in Coral Bay, St. John that included 16 participants.

Each meeting began with a presentation followed by a Question-and-Answer (Q&A) session. All comments submitted during the meetings were entered into PEPC to be considered with other public comments. At each meeting and during the course of the comment period, the public was encouraged to submit comments through the NPS's PEPC website at <http://parkplanning.nps.gov/CaneelBayRedevelopment>.

Considering input from the public and other stakeholders received during the public meetings and other communications, on February 2, 2023, the NPS expanded its outreach and extended the public comment period for two additional weeks through March 6, 2023, resulting in a 45-day public comment period. This announcement was made via press release, social media, the Park's website and PEPC. On March 6, 2023, the last day of the public comment period, the NPS staff were available at the Ivanna Eudora High School cafeteria on St. Thomas and the Park's Visitor Center pavilion on St. John to offer comment forms and explain where to find more information on the EA. This outreach, as well as the following additional community engagement efforts, were held leading up to and during the public comment period from January to March 2023.

- January 9, 2023 The Park Superintendent shared information about the EA with the Pastoral Council of St. John and offered outreach events if invited.
- January 25, 2023 NPS hosted a virtual agency meeting to hear comments from federal and territorial agencies.
- January 25, 2023 NPS hosted a virtual Community Organization Leaders meeting to share information on the plan and hear comments from their organizations.
- January 26, 2023 NPS hosted a virtual Business Community Leaders meeting to share information on the plan and hear comments from them.
- January 27, 2023 The Park Superintendent was interviewed about the EA during a 40-minute appearance on the "Analyze This with Neville James" radio show on WTJX-FM 93.1.
- February 9, 2023 NPS held a virtual meeting with U.S. EPA to discuss the plan.
- February 10, 2023 The Park Superintendent was interviewed about the EA during a one-hour appearance on the "Step Up To The Truth" radio show on WSTA-AM.
- February 13, 2023 The Park Superintendent shared information about the EA with the Pastoral Council of St. John and offered outreach events if invited.
- February 15, 2023 The Park Superintendent shared information about the EA at a public meeting hosted by the Rotary Club of St. John.

- March 4, 2023 NPS held an outreach event at Our Lady of Mount Carmel Catholic Church in Cruz Bay, St. John, after their evening mass service.
- March 5, 2023 NPS held three outreach events at Our Lady of Mount Carmel Catholic Church in Cruz Bay, St. John, after their 7:30 am and 9:30 am mass services.
- March 5, 2023 NPS held an outreach event at Calvary Baptist Church in Coral Bay after their 11:00 am service.
- March 5, 2023 NPS held an outreach event at St. Theresa Catholic Mission in Coral Bay after their 12:30 pm mass.
- March 5, 2023 NPS held an outreach event in Spanish at Our Lady of Mount Carmel Catholic Church in Cruz Bay, St. John, after their 5:30 pm Spanish mass service.
- March 6, 2023 NPS held an “office hours” afternoon event to provide information and receive public comments at Ivanna Eudora Kean High School, St. Thomas.
- March 6, 2023 NPS held an “office hours” afternoon event to provide information and receive public comments at the park’s Visitor Center pavilion, Cruz Bay, St. John.

During the public comment period, a total of 1,122 correspondences were received. Most of the correspondences were submitted by unaffiliated individuals but some were submitted by local organizations and the federal government. Correspondences were received from a diverse range of geographic areas including representation from individuals and local organizations on St. John. The majority of the correspondence was received from 51 states and territories of the United States. A few comments were also received from other countries.

DEFINITION OF TERMS

The primary terms used in this document are defined below:

Correspondence: Correspondence is the entire document received from the public. This includes unaffiliated individuals, organizations, government officials, and agency representatives. This can be in the form of a letter, emails, meeting transcriptions and comments, comments written directly into PEPC, by mail, or in person at the Park.

Comment: A comment is a portion of the text within the correspondence that addresses a single subject. It could include information as an expression of support or opposite for an alternative concept, additional ideas for future management of the site, data regarding the existing condition, or suggestions for topics to be considered.

Code: A code is a grouping centered on a common subject. Codes were developed during the civic engagement and public involvement process and are used to track major subjects in the EA.

Concern: Concerns are statements that summarize the comments identified by each code. Each code is further characterized by concern statements to provide a better focus on the content of the comments. Some codes require multiple concern statements, while others do not.

COMMENT ANALYSIS METHODOLOGY

Comment analysis is a process used to compile and correlate similar comments into a usable format for decision makers and the project planning team. Comment analysis assists the NPS in organizing, clarifying, and addressing information pursuant to National Environmental Policy Act regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management (PEPC)
- reading and coding comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topic and issue. The NPS derived the coding structure from an analysis of the range of topics discussed during public scoping, past planning documents, and the comments themselves. The coding structure was designed to capture the content of the comments rather than to restrict or exclude any ideas.

The NPS PEPC database was used to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. The database tallies the total number of correspondences and comments received, can sort and report comments by a particular topic or issue, and provides demographic information on the sources of each comment.

Analysis of the public comments involved assigning codes to statements made in letters, email messages, and comment forms submitted via the PEPC database. All comments were read and analyzed, including those of a technical nature, opinions, suggestions, and comments of a personal or philosophical nature.

Under each code, all comments were grouped by similar themes, and those groups were summarized with a concern statement. Although the analysis process attempts to capture the full range of public concerns, this report should be used with caution. *Comments from people who chose to respond do not necessarily represent the sentiments of the entire public.*

COMMENT ANALYSIS TABLES

The following tables were produced by the PEPC database and provide information regarding the types of comments received, organized by code and by demographics. Tables 1 through 3 provide data on the number of correspondences received by organization type, state, and country. Table 4 is a summary of the number of comments received under each code.

Table 1. Correspondence Distribution by Organization Type (1,122)

Organization Type	Correspondences
Federal Government	1
Unaffiliated Individual	1,121
Total	1,122

Table 2. Correspondence Distribution by State or Territory

State/Territory	Percentage	Number of Correspondence
VIRGIN ISLANDS	13.5%	152
NY	7.0%	79
TX	6.1%	68
PA	5.5%	62
FL	4.7%	53
MA	4.5%	50
NJ	4.4%	49
VA	3.8%	43
CA	3.7%	42
UNIDENTIFIED	3.6%	40
IL	3.2%	36
GA	3.1%	35
NC	2.9%	32
MD	2.7%	30
OH	2.5%	28
MI	2.4%	27
CT	2.4%	27
SC	2.3%	26
MN	1.8%	20
AZ	1.6%	18
TN	1.6%	18
DE	1.3%	15
CO	1.3%	15
WA	1.1%	12
NH	1.0%	11
IN	0.9%	10
VT	0.8%	9
WI	0.8%	9
ME	0.8%	9
DC	0.7%	8
AL	0.7%	8
RI	0.6%	7
LA	0.6%	7
IA	0.5%	6
MT	0.5%	6
OR	0.5%	6
ND	0.5%	6
ID	0.4%	5
NV	0.4%	5
KY	0.4%	4
UT	0.4%	4
NE	0.4%	4
MO	0.4%	4
OK	0.3%	3
KS	0.3%	3

State/Territory	Percentage	Number of Correspondence
SD	0.2%	2
NM	0.2%	2
MS	0.2%	2
WV	0.2%	2
PR	0.2%	2
AR	0.1%	1
Total		1,122

Table 3. Correspondence Distribution by Country (10)

Country	Percentage	Number of Correspondence
United States of America	97.4%	1,092
Italy	1.9%	21
Canada	0.3%	3
Spain	0.2%	2
Argentina	0.1%	1
Costa Rica	0.1%	1
Peru	0.1%	1
Portugal	0.1%	1
Total		1,122

Table 4. Correspondence Distribution by Code

(Note: Each correspondence may have multiple codes. As a result, the total number of correspondence may be different than the actual comment totals)

Code	Description	Comments
AL1030	Alternatives – Support Alternative B	471
AL4000	Alternative – EHI/CBIA Advocacy	279
AL1010	Alternatives – Support Alternative A	256
AL1020	Alternatives – Oppose Alternative A	241
AL3000	Alternatives – New Alternatives and Elements	154
IS1100	Issues and Impact Topics: Socioeconomics	84
IS1200	Issues and Impact Topics: Visitor Use and Experience	64
AL1040	Alternative – Oppose Alternative B	45
AL4010	Alternatives – EHI/CBIA Opposition	30
CL1000	Competitive Lease or Concession Process	29
ED1000	Data, References, Figures, Request for Information	28
AL2900	Alternative B (substantive)	23
IS1600	Issues and Impact Topics: Other (Traffic, wildlife etc.)	20
IS1300	Issues and Impact Topics: Archeological Resources and Historic Structures and Districts	13
SR4000	Sustainability and Resiliency	13
CC1000	Consultation and Coordination	12

Code	Description	Comments
AL2000	No-action alternative (substantive)	11
CO1000	Contamination and Clean Up	10
PN1000	Purpose, Need, and Objectives	7
IS1000	Issues and Impact Topics: Coastal Resources and Floodplains	5

SUMMARY OF COMMENTS

The following report is organized by codes, followed by the associated concern statement(s) and response(s) to concerns. Representative quotes are provided for each concern statement.

Representative quotes provided below are taken directly from PEPC and are shown exactly as they were entered. Grammar and spelling have not been changed. These representative quotes are not the only comments received under this particular concern statement; however, these quotes have been chosen to represent those comments categorized under each concern statement.

AL2000 No-action alternative (substantive)

***CONCERN STATEMENT:** Commenters stated that the property should be fully open and available for use by the local community of St. John. Commenters expressed concern that the no-action alternative would potentially result in the misuse and destruction of the property by the general public due to limited enforcement on the property.*

Representative Quotes:

Correspondence ID: 863 **Comment ID:** 1165400

Comment Text: keeping Caneel in the public domain and open the beautiful beaches there Honeymoon, Scott, Turtle and Caneel to the growing public need. Rockefeller was correct in his thinking. This island needs more open beach space and should be returned to the public domain

Correspondence ID: 865 **Comment ID:** 1165409

Comment Text: The need for more open, affordable recreation space along the magnificent Northshore is critical. Alternative A would provide new access to a much broader and less privileged public.

Correspondence ID: 883 **Comment ID:** 1165511

Comment Text: At this time, we are especially asking for your consideration and support of keeping the Caneel Bay beaches and surrounding land most beautiful by not building hotels , etc ! More tourists, traffic , and people will bring more destruction and contamination and pollution to the Park. The ocean and beaches and vegetation will be severely compromised .

Correspondence ID: 1009 **Comment ID:** 1166333

Comment Text: As stated in our letter of Feb 28, 2022, we originally were proponents of a version of a no action plan; however, the no action plan currently presented by NPS creates concern for us. It is somewhat disappointing that there is no option which provides for increased public access to the Caneel Bay property along with NPS oversight and maintenance similar to what exists at other NPS beaches where day-use amenities (restrooms, some food options, non-motorized watersports) could be provided without the overnight experience. Although we appreciate the idea of having the property become a Conservation Zone with increased public access, we are concerned that with only a minimal NPS presence, there will be overuse of the property due to its proximity to Cruz Bay. Minimal work on existing trails and limited parking described under Option A would further cause the property to be misused. In addition, the fact that only minimal rehabilitation would be performed with the historic structures is also a concern, as we know that there will be further deterioration of these structures without intervention and future maintenance.

***NPS RESPONSE:** The NPS recognizes that many commenters would like to see the no-action alternative implemented at the Caneel Bay area. Through outreach with the public during the civic engagement process, reestablishing the overnight accommodations at the site was a very common request among the public. Alternative B has benefits to the local economy, visitor experience, and the Caneel Bay Historic District. The use of the site as an eco-resort is part of the historical significance of the Caneel Bay area. Therefore, overnight accommodations were included as part of the purpose and need for the Environmental Assessment (EA). The NPS preferred alternative (Alternative B – Redevelopment) aims to balance making the Caneel Bay area accessible to the public by identifying day-use areas (Honeymoon Beach, Little Caneel Beach, and Caneel Beach) while providing an overnight lodging visitor use opportunity. Alternative B best meets the purpose and need because Alternative B (1) aims to provide for a range of visitor use and experiences; (2) promotes economic activities by providing employment and business opportunities; (3) minimizes impacts on the Caneel Bay Historic District by restoring the site to its historical use as an eco-resort destination, which is part of the historical significance of the site; and (4) through the use of a commercial services contract, provides a financial means for the rehabilitation, upkeep, and adaptive reuse of the historic structures/buildings and designed historic landscape, which are contributing features of the Caneel Bay Historic District.*

AL2900 Alternative B (substantive)

***CONCERN STATEMENT:** Some commenters would like to see the property returned to a resort guest-only property with no public access. Alternatively, commenters also expressed the need for more public access to all of the beaches and other areas on the property.*

Representative quotes:

Correspondence ID: 215 **Comment ID:** 1163141

Comment Text: I strongly feel that you should rebuild an exclusive resort as soon as possible at the Caneel Bay resort site. There is no need for public access; there are much better beaches all over the island. You need to assure safety of resort guests. Mr. Rockefeller left an enormous amount of land to the public.

Correspondence ID: 256 **Comment ID:** 1163164

Comment Text: Rebuild and reopen resort as it used to be in the past," 5 star resort "

Correspondence ID: 896 **Comment ID:** 1163579

Comment Text: I think option B of redevelopment is the right idea but I would really stress that the beaches and other areas should be made available to non-resort stayers of Caneel as well. Locals and other individuals should be allowed to freely access Honeymoon and Saloman, and potentially other areas of Caneel. In addition the preservation of wilderness and the focus on less development particularly along turtle bay should be a priority

Correspondence ID: 1098 **Comment ID:** 1166621

Comment Text: Second and similarly, we are concerned that the description of the Alternative B is vague and ambiguous with respect to public access to and use of Scott Beach and North Hawksnest Beach, which are within the envisioned footprint for private redevelopment. Potential developers can be expected to argue for exclusive use of these beaches by hotel patrons for both marketing and "security" reasons, but we think those beaches should be publicly accessible for day use. There is no good reason to automatically and completely exclude taxpayers from these or any of Caneel Bay's beaches. If necessary, the NPS should charge a use fee as at Trunk Bay to recover costs associated with providing public access to Caneel Bay, including Scott Beach and North Hawksnest Beach, and to help manage potential overcrowding.

***NPS RESPONSE:** The NPS acknowledges that there exists a diversity of views regarding public access to the Caneel Bay area versus resort guests only. Through coordination with the public during the civic engagement process, comments from the public to include overnight accommodations at the site were frequent. Having considered public comments received on the proposed action during civic engagement, the NPS preferred alternative (Alternative B – Redevelopment) provides a balance of public access and with an overnight lodging visitor experience consistent with the historical use of the site. As discussed in the description of the preferred alternative in the Environmental Assessment (EA) (pages 9-15), the NPS would work with developers in the future to seek appropriate public access to the Caneel Bay area while also reestablishing an overnight experience that is consistent with Laurance Rockefeller's eco-resort vision.*

***CONCERN STATEMENT:** Commenters would like to see a future plan that incorporates the needs of the local community and invests in the employees at Caneel Bay. Commenters expressed concern that future developers would not abide by the proposed plan and that future contracts would need to include a clear vision of the redevelopment plan.*

Representative quotes:

Correspondence ID: 907 **Comment ID:** 1163581

Comment Text: Caneel Bay needs to incorporate community needs and entrepreneurial opportunities and not continue as an exclusive luxury resort. It is simply not fair by any stretch of imagination that residents could not enjoy the natural resources provided at the seven beaches.

Correspondence ID: 918 **Comment ID:** 1163587

Comment Text: As a frequent visitor to Caneel Bay, I want to see the land belong to the people that make the resort possible. They should be invested in its success, not just as hired help. The new resort needs to focus on being as Green as possible using the newest technologies to avoid pollution of the land and ocean. When I am stressed I think of walking on the sand at Trunk Bay or just watching the clouds from a perch on the rocks.

Correspondence ID: 1098 **Comment ID:** 1166620

Comment Text: Our support for Alternative B is predicated on the NPS sticking to the vision and requirements outlined in that alternative. We have three primary concerns in this regard. First, we are concerned that potential developers will pressure the NPS to enlarge the footprint for their exclusive control at the expense of public access and use. The NPS must withstand and reject any such pressures.

Correspondence ID: 798 **Comment ID:** 1165938

Comment Text: The downside to commercialization would be case in point the RUE and the disastrous management company that left Caneel bay in the condition it is now in. The key to Option B will be to have well-thought-out contracts that allow the business or nonprofit to invest and make money over the contract timeframe while providing services; however, defined contract timeframes, oversight, and policing will be critical.

***NPS RESPONSE:** As discussed in the Environmental Assessment (EA) (pages 15-16; 43), the NPS would issue a request for proposal (RFP) for the redevelopment of the Caneel Bay area. The type and scale of overnight lodging has not been established at this time. Any redevelopment would be consistent with NPS management policies and the desired conditions presented in the EA. For example, one such condition is the number of guest rooms be limited to 166 rooms. The RFP as well as future commercial services contract would set forth terms and conditions related to contract timeframe and the developer responsibilities in managing and maintaining the site. Future developers would be selected by the NPS through a competitive commercial services process, and the commercial operations at the Caneel Bay area would contribute to the local economy by providing meaningful employment opportunities for the local community and local businesses.*

AL3000 Alternatives – New Alternatives and Elements

***CONCERN STATEMENT:** While some commenters would like to see all of the beaches available to the public, other commenters do not want to see a mixed-use development providing both public access and resort-guest accommodations.*

Representative Quotes:

Correspondence ID: 533 **Comment ID:** 1164519

Comment Text: What I would like to punctuate is the critical importance of ensuring that the property remain fully accessible to all residents of the USVI - and that efforts be taken to make certain that Virgin Islanders feel welcome in every area of Caneel Bay. The property

should be every bit as accessible as any national park in the U.S. - which is to say fully open, but with active safety protocols and resource protections in place. I never want to see a return to the days when someone who isn't a guest at a resort on the property is effectively treated like a second-class citizen, charged for parking, and directed to walk a public access trail to the beach through the least attractive part of the property. As a side note, I'm not opposed to the temporary concessions that currently are in place - e.g., Zozo's Restaurant. But the Caneel Bay Beach Club that has recently started operating at Honeymoon Beach is really confusing. Is it open to residents who don't pay \$800 for a cabana rental? Why are restrictions in place on bringing in personal use items? Information on the website is poorly drafted and unclear on the rules. Honestly it feels like beach access is prioritized for paying tourists. I think this warrants a closer look.

Correspondence ID: 844 **Comment ID:** 1165526

Comment Text: I believe you are destroying what was once a wonderful eco friendly luxury resort by giving public access to all the main beaches and the dining areas. My wife and I and another couple came to Caneel for 11 years every January and stayed for either 2 or 3 weeks every time. We loved the low key nature friendly atmosphere and most of all the privacy and seclusion. St.John has a multitude of public park beaches but had only one truly First Class resort that was worth the high cost. If you do what you are proposing and Allow day trippers full access to what others are paying for to stay there then you will destroy the privacy that made it first class. Now you will be neither a public beach or a private resort but a public park with overnight rooms. You might as well kill all the jobs you think are coming back because no one will pay a high price for a public beach, and the operator will not have the cash flow to pay locals to provide what once was first class service in the dining areas and the rooms. If you allow everyone open access I would never choose to come back to St.John because you would no longer have a 4 or 5 star resort on the island. Shame on you for turning it into nothing more than what is already all over the island beaches except now you can spend the night in a room instead of a tent! The government at work has again ruined what was a great attraction to the island. Just add more tents and be done with it. Good luck making the numbers work on the nightly rates when you have every day tripper on the island using your same amenities.

***NPS RESPONSE:** The NPS recognizes that there is a diversity of views regarding public access to the Caneel Bay area versus resort guests only. As described in the purpose and need of the Environmental Assessment (EA), the preferred alternative includes a mixed-use development with a balance of public access and resort-guest experiences. As discussed in the description of the preferred alternative in the EA (pages 9-15), the NPS would work with developers in the future planning process to seek appropriate public access to other beaches on the property, while also reestablishing an overnight experience. The NPS aims to provide a range of visitor experiences for resort guests (overnight) and public (day-use) opportunities (pages 47-48). These experiences would be a key consideration in the request for proposal (RFP) process and the future development of the Caneel Bay area.*

***CONCERN STATEMENT:** Commenters suggested new alternatives and/or elements should be considered. These suggestions include:*

- *Provide more low-range accommodations and/or campsites, similar to Cinnamon Bay or Maho Bay*
- *NPS to charge a fee to the public to access the property*

- *NPS to control visitor usage of the property to prevent overcrowding and disturbance to natural and cultural resources*
- *Create an eco-friendly development, self-sustaining development, and install solar power*
- *Incorporate a transportation plan to address inadequate parking*
- *Utilize the existing buildings on the property for future development*
- *Establish affordable housing for workers on the property and residents*
- *Provide a museum*
- *Install a pool*
- *Incorporate a marina for public use*
- *Provide opportunities for the arts for the students of St. John*
- *All overnight accommodations should be mid-range priced while some commenters would not like to see any overnight accommodations*
- *Incorporate designated quiet zones for the public beaches*
- *Remove the concessions on Honeymoon Beach*
- *Provide more ADA access to the beaches*
- *Install informational buoys to restrict anchoring near seagrass and install signage for educational purposes*
- *Context sensitive redevelopment to honor Rockefeller's original concept*

Representative Quotes:

Correspondence ID: 645 **Comment ID:** 1164583

Comment Text: I would prefer Option A, which is to basically turn over the land to the NPS and make it accessible to visitors for day use, but not redevelop a luxury resort. I would hope that, eventually, the NPS could add some services to make visiting easier, such as roads, parking, restrooms, limited food and beverage service, and possibly camping. Something along the lines of Cinnamon Bay would be fantastic. All of this could be done over time as funding allows. Personally, I would be fine with paying a nominal fee for day usage, such as the \$5/person fee at Trunk Bay.

Correspondence ID: 638 **Comment ID:** 1163487

Comment Text: Why not a family friendly, affordable option like Cinnamon Bay Campground, or the old Maho campground or eco-friendly like Concordia?

Correspondence ID: 880 **Comment ID:** 1165497

Comment Text: Just like nearly all parks in the National Park System, this area could have a gate, an entry fee and controlled usage.

Correspondence ID: 460 **Comment ID:** 1164480

Comment Text: 1. THE NATIONAL PARK MARINA: Although approximately 60% of our Island of St. John, and most of the surrounding waters, is part of the Virgin Islands National Park, and yet the National Park offers the boating world only a small 15 minute finger pier and a few scattered moorings. There is no place on St. John where a boater

could tie up their boat and visit the park. There isn't even an adequate dinghy dock for our visiting boaters. Even the NPS's fleet of boats need better facilities. Every National Park in the United States offers access and facilities for their visitors, yet our Virgin Islands National Park provides virtually no access from the sea. Creating a NPS Marina from the Caneel Bay Shipyard to the Seaplane Landing would open the door to a profitable marina operation while providing better access. Marina fees for sailboats and powerboats visiting the park would provide funds and enhance the park's image and be financially beneficial for the St. John businesses "Gateway" community. By building a Marina and Boardwalk along the shoreline from the Caneel Bay Shipyard and fueling station to the Seaplane Landing, the National Park will be living to its mandate of providing access. As we can easily see by our neighbor islands, the British Virgin Islands, there are great opportunities possible by providing access for our visiting boaters instead of the obstacles which they presently face in trying to visit our St. John National Park. It is my belief that the Caneel Bay Shipyard is a significant part of the Caneel Bay Resort and therefore is part of the Redevelopment and Management considerations. *****in the "Attachment" below please find a rendering of how such a marina could be designed and built. I designed this plan with the help of architect John Daly of Oxman and Associates.

Correspondence ID: 820 **Comment ID:** 1165485

Comment Text: I am in Favor of Alternative B. I would like to see a mid ranged priced resort that is aesthetically pleasing and complimentary to the surrounding area. Re-development of this area will provide a lot of opportunities and financial gain for the St. John Community. The re-development should include a reverse osmosis water treatment facility, incorporation of solar power, ample parking, and onsite employee housing in some capacity. The Caneel Bay property should be freely accessible to VI residents and visitors for day use. One other concept to consider with this project is some sort of shuttle system that would operate throughout the VINP. As you are aware, the demand for parking within the park is greater than the supply. This has resulted in large vehicles parking in fragile vegetation as well as unsafe spots such as along the switch backs beyond Trunk Bay. Perhaps this could be a partnership with the Caneel Bay Operator. Thank you, NPS, for your thoughtful consideration and public input on how to best use this precious resource to benefit St. John, the Virgin Islands, and visitors alike. Also please allow for pickle ball courts.

Correspondence ID: 481 **Comment ID:** 1168977

Comment Text: I think you should include solar power in the redevelopment for several reasons. First, it can be no-cost for the developer by getting financing that includes a financier who will take the tax and environmental credits, and just charge the resort for the electricity over the term of ownership - - much more financially efficient than maintaining and fueling a generator. Second, it makes it clear that you are walking the talk on sustainability. Third, it does your part toward mitigating climate change, which is left unchecked will be a death knell for the island. Fourth, it will be much lower noise and lower pollution than any other form of energy you might be considering. And last, it will inspire guests to go home and install solar in their own communities. It could

be done on all rooftops, as well as in selected portions of flat land, and used as parking lot canopies.

Correspondence ID: 958 **Comment ID:** 1165612

Comment Text: An additional point of feedback regarding the transportation planning relates to local residents wanting to use park beaches . if the future plan is to charge parking fees I would like to recommend annual parking passes for residents. senior citizens are not always capable of hiking into locations so please consider this when planning the future transportation plans. Parking is such an issue for us that we cannot visit most beaches other than Hawksnest (arriving at lunchtime) because of the parking situation

Correspondence ID: 1104 **Comment ID:** 1168982

Comment Text: Consider infrastructure impacts and mitigation required such as improvements to North Shore Road as well as secondary and tertiary roads that will see an increase in vehicular transportation. Parking and public transportation options should also be assessed and implemented appropriately, especially for the increase in commuter traffic before and during construction as well as commuter traffic for those working at the proposed Caneel Bay site.

Correspondence ID: 665 **Comment ID:** 1164638

Comment Text: Also, it would be a waste not to use the facilities that are already present. As far as the cottages in the floodplain, either moving those, raising them or making them more temporary could address some of those concerns. I think having the facility back would really be helpful to the island and a positive or the NPS. The plan seems to address protection of resources, both natural and cultural. For these reasons I support the redevelopment of Caneel Bay Facilities as described in the preferred alternative. Thank you for your time. {name redacted}

Correspondence ID: 1104 **Comment ID:** 1166916

Comment Text: EPA suggests NPS consider recycling material or reusing existing structures while considering sea level rise in planning where to develop and invest resources. EPA acknowledges that NPS has cited EPA resources in its work to incorporate circular economy practices in the proposed action, and we offer other tools and guidance that can support the circular economy approach, particularly regarding construction and demolition materials to support efforts championed by NPS:
<https://www.epa.gov/smm/sustainable-management-construction-and-demolition-materials>

Correspondence ID: 1104 **Comment ID:** 1166845

Comment Text: EPA recommends that green infrastructure be incorporated into the final proposed design for redevelopment of the site area, including re-planting native plants such as mangroves located in other parts of Virgin Islands National Park for long-

term reforestation of the site, particularly in areas where vegetation was lost due to the impact of Hurricane Irma and Hurricane Maria in 2017. EPA has developed substantial guidance, modeling tools and BMPs for green infrastructure that can support efforts to manage stormwater, including the Green Infrastructure in Parks: A Guide to Collaboration, Funding, and Community Engagement.

https://www.epa.gov/sites/default/files/2017-05/documents/gi_parksplaybook_2017-05-01_508.pdf

Correspondence ID: 683 **Comment ID:** 1164649

Comment Text: Caneel Bay could set an example for the world as practically self-sustaining resort with a net zero environmental impact. With the land available they could grow much of the food necessary to sustain the resort. They could have some animals like chickens for fresh eggs and cows for dairy products. They might be able to farm seafood as well. Growing up on Cape Cod in my home area over 50 years ago there was a warehouse type building where they grew clams and oysters in large trays of water. In that case they were used to seed beds locally to restore the shellfish that had been over harvested but in this instance it could be consumed locally. Much of the waste could be composted and some could be recycled and used on site. The waste that cannot be reused in some manner would be packed and shipped back to the mainland for recycling. All of this costs money and that is where the need for a very high end, exclusive resort comes in. The well to do people and celebrities pay a lot of money for luxury and privacy, add to that the bragging rights that they are staying at and contributing to a resort that is net zero and you have a winning solution for everyone. It might mean that the resort is not as wide open as some might want due to the need of privacy for these people but with the use of agriculture and recycling there would be far more jobs made available to the local population than there were under the original Caneel Bay resort. I am writing this as a private citizen but as one of the founders of IGLA / IGBA (Island Green Living Association / Island Green Building Association), I see this as a very doable answer as to what Caneel Bay could become.

Correspondence ID: 792 **Comment ID:** 1164734

Comment Text: When thinking about the creation of a large-scale hotel resort at Caneel bay, I can't help but think "where will the workers live?" and "where will they come from?" There's a housing crisis on St John and most employers are struggling to find enough workers to maintain normal operations. I'll end with a sentiment that I'm sure is popular among residents of St John. The National Park beaches should be accessible to everyone, not reserved for exclusive resort patrons.

Correspondence ID: 720 **Comment ID:** 1164677

Comment Text: Alternative A is my preference with potential for future activities such as community gardens, or a larger scale sustainable garden project; better community and public access to the beaches with handicapped parking and services; and greater emphasis on the history of the island. St. John is full of great lodging and dining options so there is no need for additional lodging and dining,

Further, the current establishments on St. John are struggling to find employees. Rebuilding a resort at the property will place undue demand on the limited human resources on island, It is not needed and would be detrimental to the environment. Given the size of the property, another consideration should be to look into creating affordable housing for island residents. This housing could take many forms but should factor in the needs of families as well as individuals.

Correspondence ID: 739 **Comment ID:** 1164701

Comment Text: I would like to see the Caneel's beaches, trails, and historical markers opened with full public access for residents and visitors. I envision each of the beaches would have commercial activity to provide water sports, food, drink, and shower/toilet facilities, similar to Trunk Bay's current operation. I would like to see each beach also have a designated quiet zone for those who want to enjoy the nature without the commercial activity. The trails for the peninsula should be open to everyone and connect the trails in the rest of the park. A historical monument/museum would be appreciated too with potential use as a community center as mentioned in the plans. I believe any commercial activity including lodging in fact limits the public access in both real and perceived ways, and I am 100% against this part of the plan. Any resort presence, especially a higher end resort, will limit public access. The resort will want to cater to their guests by providing private beaches whether it allowed or not, and most conscientious visitors will not try use the beaches in close proximity to lodging paid for by others. With the RUE expiring, it is time now for the public to have full use of the property.

Correspondence ID: 785 **Comment ID:** 1164728

Comment Text: In the event that the NPS nevertheless selects Option B, Redevelopment, I strongly urge that any overnight accommodations to be established on the Caneel Bay peninsula be strictly limited in size and location, and - - importantly - - that they be affordable (unlike the former resort at Caneel Bay, which was very expensive). In terms of location, any overnight units should be located at some distance away from the beaches. The beaches themselves should remain accessible to the general public (including, of course, any guests staying at the overnight accommodations); that is, the beaches should not be considered "private" for the exclusive use of the guests staying at the overnight accommodations. In terms of size, any overnight accommodations should be restricted to no more than two stories in height, and should be clustered in relatively close proximity to one another so as to limit the areal extent of their "footprint." In terms of affordability, any overnight accommodations in Caneel Bay should be priced in the mid-range. Lower priced accommodations currently exist at Cinnamon Bay; and higher priced accommodations exist in certain facilities in Cruz Bay and among private rentals. In summary, Caneel Bay should not again be the location for luxury accommodations that only wealthy patrons can afford.

Correspondence ID: 852 **Comment ID:** 1165381

Comment Text: The other big thing I would love to see is a pool overlooking the ocean. I have seen this pool in old photos of the resort, and know that it used to exist. And not tucked away in the corner of the resort like the pool that was at the hotel before the hurricane.

Correspondence ID: 849 **Comment ID:** 1165529

Comment Text: I also recommend returning Honeymoon Beach to its original state, with no concessions or other services. It was a special place, being the one beach in the Caneel Bay area that was completely undeveloped. The addition of concessions a few years prior to the hurricane changed the character of the beach into one that was primarily about commercialization, not nature.

Correspondence ID: 1085 **Comment ID:** 1165992

Comment Text: St. John has experienced immense change since the donation of land and the creation of the RUE and no longer needs additional overnight accommodations. In fact, the island needs more accessible park space, recreational opportunities, parking, and long-term housing.

Correspondence ID: 1044 **Comment ID:** 1165790

Comment Text: If there is a lodging zone, there should still be public access. For socioeconomics, need to make sure that there is a place for a performing arts center, and I hope it would be in the future plan.

Correspondence ID: 1037 **Comment ID:** 1165770

Comment Text: Need opportunities for the arts - maybe a location for the students.

Correspondence ID: 811 **Comment ID:** 1165972

Comment Text: The public's access to beaches should include funds for one or two beach wheelchairs, to allow access to the beach for handicapped individuals. (Note: I would NOT make any kind of wide path to the beach because of possible mis-use by people using golf carts or worse to lazily get to the beach. If you give humans an inch they'll take more than a mile, IMHO) I have seen this kind of beach wheelchair and it looked pretty easy to negotiate for the handicapped person's aide.

Correspondence ID: 1104 **Comment ID:** 1166853

Comment Text: One possible action to consider is the installation of informational buoys to demarcate seagrass areas and restrict anchoring, as well as the development of an educational program for visitors on the values and functions of these ecosystems.

Correspondence ID: 1006 **Comment ID:** 1166303

Comment Text: This alternative should be altered to include appropriate restoration of historic structures, removal of recent era resort structures not suitable for current VINPS use, and the development of visitor access and interpretive services designed to encourage responsible use of the natural, cultural and historic resources of the area. From a project management perspective, the NPS has a long history of incorporating historic structures and facilities into interpretive day use sites, including St. John's Annaberg Plantation on which to model this plan.

***NPS RESPONSE:** The purpose and need of the Environmental Assessment (EA) is to integrate the value and history of the community of St. John; preserve and protect significant cultural and natural resources; provide a range of visitor experiences, including overnight and day-use opportunities; and promote economic activities. The development would blend with the landscape. The preferred alternative incorporates management zones within the Caneel Bay area to provide a range of uses for the Caneel Bay area, as described in chapter 2 of the EA (pages 9-16). Management zones outline designated areas where specific desired conditions may be established and appropriate uses defined, such as, but not limited to, overnight lodging, public access areas, conservation areas to connect with the natural areas of the Park, and interpretive areas to engage with NPS staff. Additionally, two locations are proposed to accommodate for a future community space for the local community. Further analysis on the implementation of the preferred alternative would be conducted during future planning and design. The NPS would consider new elements to be implemented for the development during the future request for proposal (RFP) process. The proposed action/preferred alternative in the EA would not preclude the NPS or developer/operator from proposing some elements, such as a farmers market, wellness facilities, etc., as long as they are consistent with NPS management policies, as described in the EA (page 23).*

CC1000 Consultation and Coordination

***CONCERN STATEMENT:** Several commenters expressed concern that there has not been enough coordination with the local community. A commenter also said that the NPS should coordinate with the Interagency Working Group for the Virgin Islands and the Virgin Islands Department of Planning Natural Resources (DPNR) to address the future assessment and associated clean up needs prior to and during any development of the site.*

Representative Quotes:

Correspondence ID: 1023 **Comment ID:** 1165741

Comment Text: The park needs to be involved in the local community of St. John.

Correspondence ID: 1103 **Comment ID:** 1166742

Comment Text: we urge NPS to do its utmost to center community engagement and inclusion in the process of re-envisioning what Caneel Bay can become in the future, and to do their utmost to ensure authentic inclusion of local community perspectives in all decision-making processes.

Correspondence ID: 1104 **Comment ID:** 1166924

Comment Text: While this property would not be considered eligible for Brownfields designation since it is a federal facility, EPA Region 2 Brownfields would like to invite NPS to coordinate with the Interagency Working Group for the Virgin Islands to access other resources to address future assessment and associated clean-up needs prior to and during proposed redevelopment and management of Caneel Bay. Please contact Schenine Mitchell, EPA Brownfields VI coordinator at Mitchell.Schenine@epa.gov for follow-up. o CERCLA Section 128(a) State and Tribal Response Programs: Section 128(a) authorizes a non-competitive \$50 million grant program to establish and enhance state and tribal response programs. The VI Department of Planning and Natural Resources (DPNR) receives this funding from EPA to support assessment and cleanup activities in the territory. EPA recommends NPS work with DPNR to identify possible collaborative efforts with respect to future assessment and cleanup operations when NPS has full access to the Caneel Bay site. o Caribbean Brownfields Week is expected to occur in the Virgin Islands in May 2023, and EPA would like the opportunity to visit the Caneel Bay site with NPS during this event to determine potential future support opportunities.

***NPS RESPONSE:** The future planning process would include ongoing consultation with the USVI Department of Planning and Natural Resources (VI DPNR) in order to fulfill VI DPNR requirements for actions occurring in a designated coastal zone. As discussed in the Environmental Assessment (EA; page 51), agency meetings have occurred during the preparation of the EA with the VI DPNR and other agencies. The NPS has conducted extensive coordination with the public, including the local community during the planning phase and during the public release of the EA. Community engagement for the EA is discussed on pages 49-51. The NPS would continue to work with the public and agencies in the future request for proposal (RFP) process.*

CO1000 Contamination and Clean Up

***CONCERN STATEMENT:** Commenters stated that the clean-up of the property should occur before any action is taken. A commenter said the NPS should work with surrounding communities to develop a debris plan since landfill space in the USVI is limited.*

Representative Quotes:

Correspondence ID: 1094 **Comment ID:** 1166605

Comment Text: The grounds of Caneel have not been cleaned up. No action can or should be taken to decide the future of Caneel until the environmental contamination has been removed.

Correspondence ID: 1104 **Comment ID:** 1166909

Comment Text: EPA understands that NPS plans to dispose of debris in accordance with all federal and territory laws. For disposal that will not be taken off-island, this may impact landfill management at Cruz Bay or on St. Thomas or St. Croix. o Landfill space in the territory is very limited, therefore we suggest that NPS work with the surrounding communities to develop a disaster debris plan using EPA guidance document "Planning for Natural Disaster Debris" or

develop their own disaster debris plan for the footprint of the park. This process can be included with the development of the Caneel Bay General Management Plan.

https://www.epa.gov/sites/default/files/2019-05/documents/final_pndd_guidance_0.pdf Chapter 2 (p. 22) states that ACM would be "properly bagged and disposed of off island..." - consider providing more clarity as to what this process would look like, and how this would impact development designs based on projected clean-up costs and other resources.

NPS RESPONSE: *NPS will follow all territory and federal regulations in all actions at Caneel, including those that result in waste generation. NPS expects that response actions to address site contamination (ACM debris removal, landfill removal, contaminated soil removal) will be implemented within the next year. NPS is currently evaluating funding options to implement the selected response actions, should the Potentially Responsible Parties not voluntarily agree to complete environmental site cleanup activities in a timely fashion.*

Any hazardous waste materials identified for disposal will be transported to the Continental U.S. for proper, legal disposal, as the landfills on St. John and St. Thomas are not permitted to receive hazardous waste. If the local landfills will not accept the non-hazardous contents of the landfill at Caneel, the NPS is prepared to send such material off-island for disposal, thereby minimizing impacts to local, U.S. Virgin Island landfills, which have limited capacity. The NPS strives to work with local communities to achieve solutions, has policies targeted at reducing waste, and appreciates suggestions on ways to achieve and/or promote these goals.

IS1200 Issues and Impact Topics: Visitor Use and Experience

CONCERN STATEMENT: *Commenters expressed concern that St. John is too small to accommodate more visitors and vehicles, as the beaches and surrounding areas area already crowded, causing a negative impact on visitor use and experience. Development would exacerbate the already overcrowded areas in and around Caneel Bay.*

Representative Quotes:

Correspondence ID: 1061 **Comment ID:** 1166367

Comment Text: NPS just listed "Least Visited National Parks" which includes Virgin Islands National Park. The list is misleading because St John is so small that it can only sustain a fraction of the visitors that larger parks can. The list was published in many national publications with the message that these parks are not crowded. That is not the case on St John. Parking is extremely limited and there is very limited public transportation to some of the beaches/trails. More visitors means more cars with no space for them.

Correspondence ID: 1101 **Comment ID:** 1166733

Comment Text: Having seen how development has already impacted areas of VINP (e.g., Salt Pond Bay with its once quiet sand beach, now overrun with foot traffic from Concordia Eco Resorts and the rental vehicles overflowing into long bumper-to-bumper lines barely parked off the road), I have a less than a rosy view of how development enhances the experience for everyone.

Correspondence ID: 1112 **Comment ID:** 1167139

Comment Text: Building a resort may seem like an attractive decision in the short term but would not prove to be in the island's best interests in the long term. A new resort at Caneel Bay will exacerbate the current overcrowding issues, especially with parking, at the park's beaches. Over the 14 years we have been coming to St. John, parking issues have dramatically increased.

***NPS RESPONSE:** As discussed in the Environmental Assessment (EA; pages 9 and 47), transportation system planning (e.g., parking, traffic circulation) to and from the Caneel Bay area would be reviewed when more detailed redevelopment plans are advanced in collaboration with a future developer/operator. One desired condition in the EA is to limit the number of guest rooms to 166 consistent with Laurance Rockefeller's vision. With this desired condition, the anticipated visitation numbers would be similar to historic levels when the resort was in operation. The NPS would work with the future developer/operator to maintain an acceptable level of visitor use to manage overcrowding of the Caneel Bay area and to protect Park resources.*

***CONCERN STATEMENT:** Some commenters said that paying resort-guests will have a diminished experience if the public is allowed access to the property.*

Representative Quotes:

Correspondence ID: 429 **Comment ID:** 1163368

Comment Text: I am concerned that if Caneel Beach and Little Caneel Beach are open to the public it will be unacceptable for potential guests of the hotel. Perhaps consider just limiting the day use to Honeymoon Beach.

Correspondence ID: 1010 **Comment ID:** 1166353

Comment Text: It seems to me that your proposed increase in day use from cruise visitors, people visiting Cruz Bay, and others could be a real problem for the new resort. The resort guests might have to deal with a lot of "riffraff" using the facilities that the resort guests are paying to use. Although you only show 5 acres for day use, what is to prevent the day users from going to any of the beaches? What is to prevent the day users from getting drunk at the resort bars, or bringing their own booze in a cooler?

***NPS RESPONSE:** Visitor use and experience for resort guests and the public would be a key consideration of the National Park Service in the future request for proposal (RFP) development. The NPS would work with the future developer/operator to ensure the objectives and desired conditions described in the Environmental Assessment (EA) are followed in the future design of the redevelopment of the Caneel Bay area. The NPS would work with the future developer/operator to maintain an acceptable level of visitor use to manage overcrowding of the Caneel Bay area. The use of designed areas in the EA for public use and access would be coordinated with a developer in the future redevelopment request for proposal (RFP) process. Ultimately, the NPS is responsible for Visitor Use and Experience and would manage the Caneel Bay area consistent with the NPS mission and management policies.*

CL1000 Competitive Lease or Concession Process

CONCERN STATEMENT: Commenters suggested stipulations for selection of the lease holder and the concession contracts, as well as what they hope the future lessor and/or concessioner would provide.

Representative Quotes:

Correspondence ID: 1103 **Comment ID:** 1165716

Comment Text: “Please employ a competitive lease strategy to redevelop Caneel Bay at Virgin Islands National Park, soliciting qualified applicants for the long-term partnership to manage hotel accommodations at Caneel Bay while protecting natural and cultural resources.”

Correspondence ID: 1099 **Comment ID:** 1166623

Comment Text: “As it may pertain to lease options, I believe somewhere in said lease the Leaser should have a clause that stipulates that the Hotelier be mindful of local hire first, as we the people of the local community must be considered; as we must have a means to provide for our families; economical survival. We live here, and we are hard working people and definitely should be considered, before going elsewhere. I feel it's an opportunity to revitalize St John/St Thomas once again. Hopefully the National Park Service will scrutinize carefully the ethical practices of the new management of the Hotel before leasing to them. Thank you for the opportunity to express the sentiment of many Local Virgin Islanders I've had the opportunity to talk to.”

Correspondence ID: 153 **Comment ID:** 1163091

Comment Text: “I would recommend that any third party concession companies be required to obtain adequate insurance to cover a catastrophic event. Had this been done with the previous concessionaire, we would not be in the current situation.”

Correspondence ID: 890 **Comment ID:** 1165558

Comment Text: “This property should be managed by responsible parties in the private sector who will have a long term vested interest in the the preservation of this resource for future secure profits. This approach will give revenue, employment and sustainable income to the people who live in the USVI. The high end tourist will bring wealth to the Island. the local folks will derive greater economic benefit if the property is administered as it was before.”

Correspondence ID: 714 **Comment ID:** 1165919

Comment Text: “A potential Caneel Bay operator needs to be given the opportunity to control all the vendors selected to operate on the Caneel Bay site, even the portion designated for public use that is tangential to the overnight resort. The vendors need to work harmoniously with each other and the operator and not in conflict. For example, if the utilities and common needs, such as transportation, are shared, which makes practical sense, the operator needs to be able to fairly distribute costs and control the process, otherwise the National Park Service will find itself the landlord of multiple disagreements and unpleasantness going forward. It wasn't clear to me

from your materials if the public vendors would be chosen and managed by the NPS team or by the Operator.”

***NPS RESPONSE:** The NPS will develop evaluative criteria for commercial opportunities in accordance with regulatory requirements of the authorities under which the opportunity is issued. For leases the NPS will follow the procedures outlined in 36 Code of Federal Regulations (CFR) Part 18 and for concession contracts the NPS will follow 36 CFR Part 51. Additionally, the National Park Service will develop evaluation criteria based on the goals outlined in the EA on pages 15-16 including encouraging local hire and meaningful employment, sustainable and resilient construction and operations, protection of the natural and cultural resources, and contributions to the local economy.*

***CONCERN STATEMENT:** Some commenters suggested extending the lease to EHI/CBIA; however, other commenters wanted these entities not to be considered as a future lessee.*

Representative Quotes:

Correspondence ID: 929 **Comment ID:** 1163596

Comment Text: “I urge the NPS to move ahead with negotiating a new lease arrangement with EHI in order to re-open Caneel Bay as a wonderful resort, as it used to be. We are by no means wealthy, but for many years we saved in order to be able to visit this unique vacation spot. It was an oasis from the stress and strife of the world. It would be a shame if it were not able to re-open.”

Correspondence ID: 290 **Comment ID:** 1166012

Comment Text: “If in 2017 you extended that lease, how quickly would it be have rebuilt...Little Dix Bay fast or Caneel fast. Yes this is a park, its different, but if thats the case, dont talk about equity and inclusion bc for 6 years you took that away in the surrounding area and you can easily measure that in the GDP to show what your equity looks like with a pure park. But your didnt do that analysis. You therefore did not calculate the cost of the equity and inclusion you wish to create and inevitably will create an unsustainable situation, that you could have better controlled within the conditions of the lease on the property just as it was.”

Correspondence ID: 1025 **Comment ID:** 1165744

Comment Text: “Given the history of CBIA, are they being considered as a lessee? If so, then that would affect the credibility of this process.”

***NPS RESPONSE:** With respect to the opportunity to provide for overnight lodging, the NPS intends to follow the competitive leasing process outlined in 36 Code of Federal Regulations Part 18. Any opportunity to lease property will, in accordance with 54 United States Code 102102, be open to any person or government entity.*

IS1000 Issues and Impacts Topics: Coastal Resources and Floodplains

CONCERN STATEMENT: *Commenters expressed concern regarding the potential impacts of flooding on portions of the property and suggested potential ways to address floodplain issues.*

Representative Quotes:

Correspondence ID: 833 **Comment ID:** 1166024

Comment Text: “Because of the current climate change trends, flooding will become more of a problem in the future than it has been in the past. This is worrisome when it comes to rebuilding so close to the water. My opinion on that would be to not only focus on rebuilding with higher standards, but also building the lodging structures farther away from the coast, which is not outlined in the plan for Alternative B in the floodplain section of the proposal.”

Correspondence ID: 1010 **Comment ID:** 1166350

Comment Text: “It bothers me that you are discussing eliminating lodging at Scott Beach and Hawksnest Beach North due to a floodplain issue. Maybe you can raise the buildings to make them more flood resistant. I don't think the guests would mind going up a few steps if it means they can stay in accommodations with a close view of the beach and easy access to those beaches. You mention that this has been done at Cinnamon Bay, so maybe it should be done here too.”

Correspondence ID: 1006 **Comment ID:** 1166315

Comment Text: “As to the Floodplains impact, any value of Alternative B relies on highly speculative assumptions an entity investing in an eco-resort of the size indicated would invest in significant structural modifications. The document asserts Alternative A would have minimal adverse impact.”

NPS RESPONSE: *To help the NPS understand the constraints of the site regarding floodplains and other factors (e.g., cultural and natural resources, future sea level rise, storm surge), a suitability analysis was conducted in the Environmental Assessment (EA; pages 17-18) identifying areas in the Caneel Bay area that could be suitable for development. Mitigation measures would be developed for floodplain protection, including requiring any future development be consistent with the goals and policies of the USVI Coastal Zone Management Program and to occur primarily outside of the existing floodplains. Any redevelopment would incorporate methods for minimizing storm damage for flood prone areas, as described in the EA (page 22). For any development within the floodplain, specifically at Scott Beach and Hawksnest Beach North, the NPS would assess impacts in accordance with the requirements in Director's Order 77-1 Floodplain Management.*

The NPS continues to ensure facilities throughout the Park are made more flood resilient by locating buildings and structures away from or elevated above the floodplain. The NPS would work with the developer/operator that would be selected in a competitive commercial services process in the future request for proposal (RFP) process to assess the Caneel Bay area to determine locations for any new buildings or potentially relocate buildings to an elevated area above the floodplain.

IS1000 Issues and Impacts Topics: Socioeconomics

CONCERN STATEMENT: Commenters stated that the proposed development would help bolster the local economy of St. John. Some commenters said that only a luxury development would be able to provide this economic benefit. Other commenters suggested that future development should focus on providing economic benefits to the local community.

Representative Quotes:

Correspondence ID: 886 **Comment ID:** 1165515

Comment Text: “The restoration of Caneel Bay as both an accessible public asset and a lodging resort would best serve the residents of the Virgin Islands who are in need of employment opportunities and those who seek the beauty of this island for leisure.”

Correspondence ID: 1113 **Comment ID:** 1167178

Comment Text: “I would like to have Caneel Bay Resort back on business because they use to give us alot of income.”

Correspondence ID: 1020 **Comment ID:** 1165728

Comment Text: “Caneel supported approximately 400 employees. There are no longer any economic opportunities here. The park does not hire locals. Locals want an opportunity to work. Caneel provided money for all (i.e., taxis). Need to rebuild Caneel to help St. John, Tortolians, St. Thomas, and St. Croix. The park needs to communicate with the locals. The park needs to start negotiations now. Litigation is ongoing and I am concerned with the timing of the litigation. As someone who has worked at Caneel, do not kill the dream of the people.”

Correspondence ID: 672 **Comment ID:** 1165867

Comment Text: “Our observation is that, despite the passage of time, the destruction is still evident. Buildings are still condemned and washed out cars still litter the roads. Many residents on the island struggle financially, and the lack of jobs and tourism keeps them from flourishing and rebuilding. I am as big a fan of St John as you will find, and in the absence of Caneel Bay, even I am starting to think about future vacations on other Caribbean islands. The jobs and income that can be generated by the rebuilding of Caneel Bay are, quite frankly, critical for future tourism on the island. But please consider this - It isn't just the jobs that Caneel Bay will create, but the jobs that will be lost as result of people, like myself, who will tire of visiting an island that is in disrepair throughout.”

Correspondence ID: 373 **Comment ID:** 1164413

Comment Text: “While I understand the environmentalists preference, in every question on development, for the land to revert to its natural state, and the populists stance that the land should have free access for all people, the facts are that this land is much more valuable to the environment and the people of St John as a 5 star resort. The benefits in employment and tax revenues and to all merchants and business owners and to the people of St John are huge. Far outweighing the benefit of access to a few extra beaches out of the dozen already available in the

VINP. Frankly, the benefits being so obvious and so substantial, it is hard to understand why this is so controversial.”

Correspondence ID: 806 **Comment ID:** 1165956

Comment Text: “What is an import and essential part of Caneel is the lovely local people who worked there. Sadly this process seems to be rather slow that many maybe too old to return. However it is a necessary part of this picture for the island to provide jobs for local people to provide for them, their families, and the island itself. Capital is of course necessary to maintain such a site and only by running this site as it previous was, both as a hotel and a well maintained "protected site" while always respecting nature can one in my mind execute such a plan.”

Correspondence ID: 1117 **Comment ID:** 1167151

Comment Text: “I also believe that as many as possible qualified employees should be, first of all from St. John itself and given decent wages to live on.”

***NPS RESPONSE:** The redevelopment strategy for the Caneel Bay area included in the purpose and need promotes economic activities. As discussed in the Socioeconomics section (pages 40-44) and Future Commercial Opportunities section (pages 15-16) of the Environmental Assessment (EA), the proposed development would focus on providing economic opportunities to local community members.*

***CONCERN STATEMENT:** Many commenters stated that the proposed development would not benefit the local economy, while other commenters stated that the local economy does not need the proposed development. Commenters also are concerned that any economic benefits would only be felt by outside investors. Additionally, some commenters felt that currently there is not enough housing on St. John to support further development.*

Representative Quotes:

Correspondence ID: 535 **Comment ID:** 1164521

Comment Text: “We are in the midst of a major housing crisis on St. John, which has continually worsened each year I have lived on island. Families, like mine, are forced to cram into small one bedrooms as there are no other options. The majority of us who live and work on St. John cannot afford the near \$1 million price tag for homeownership, so we are forced to rent. And with no oversight from the Territory, a high percentage of long-term rentals are being converted to vacation rentals. There is not enough housing for those of us who call St. John home now, so there certainly is not going to be housing for the people needed to staff Caneel Bay. Creating a new 166-room resort would negatively affect the current businesses as a corporation may pull employees from the current mom and pop businesses. So who would win in this situation? A large, presumably stateside entity with no ties to our community other than it was the chosen bidder. The Territory would also win, as it would receive the coveted 12.5% hotel tax per room, per night. The community, those of us who call St. John home, those of us who have chosen to raise our families on island, would be the losers. I strongly urge you to leave Caneel Bay alone, and give us additional beaches to enjoy. This would not only help the residents, but it would also lessen the current crowds at the other north shore beaches.”

Correspondence ID: 739 **Comment ID:** 1164703

Comment Text: “SocioEconomics - Here Alternative B is written in a favorable way in favor of development. It has been nearly 6 years since the hurricanes, and the data from my visits show there is a large need for labor and labor housing, especially for those in the service industry. The previous Caneel employees have had to move to other employment by now, but there is still a shortage on the island. Bringing Caneel lodging back would make the shortage for laborers worse. My experience with the STJ beaches and trails show me there are more than enough places for visitors to stay on the island, but there is not enough beaches/parking for them to go to. Bringing back Caneel would short term cause loss of tourists from the other island lodgings (economic hardship for them?), and eventually if all the island lodging became full again, then it would just make the beaches/parking all that more crowded. STJ has enough people, but not enough space to support them.”

Correspondence ID: 880 **Comment ID:** 1165503

Comment Text: “Rebuilding a hotel is absolutely not necessary for the economy or current tourism needs on this island. The economy is bursting at the seams. We are at carrying capacity already with the number of tourists on this island. As a business owner on island for over 2 decades, I can state with authority that business has never been better. However, staffing is nearly impossible because everyone is already employed. Employment is NOT needed. Even the VINP should be well aware of all of these facts. It would not even be possible to staff a hotel without adding employee housing. There is absolutely zero need for more accommodations on St John.”

Correspondence ID: 990 **Comment ID:** 1166253

Comment Text: “The St. John economy is not suffering. Ask the retailers in Cruz Bay, or the taxi drivers, or the villa and Airbnb owners. Business has been booming on St. John since the pandemic. Ask the restaurateurs; diners can't get a reservation at most restaurants with table cloths unless they plan days in advance. Ask the car rental agencies with their fleets of shiny new Jeeps, or the charter boat businesses. Most are looking to hire staff because business is so good, but they can't find employees because there's a critical shortage of rental housing on St. John.”

Correspondence ID: 1084 **Comment ID:** 1166566

Comment Text: “As a native St. Johnian I am well aware of the economic driver that Caneel Bay was for many generations of locals. both of my parents' first jobs were at the resort. And I know it also provided job opportunities for immigrants arriving from the lower Antilles and the BVI. However, beyond that there was little benefit to the average tax paying citizens on St. John that were not employed there. The majority of us could not afford to stay at Caneel or eat at its restaurants. Three of the major beaches were inaccessible to us. The resort represented and contributed to a sense of exclusion. Instead of promoting from within most of the managers and supervisors were White Americans hired from stateside. The profits were not re-invested in the community but squirreled away to line the developer's pockets. And the idea of people eating

dinner at a sugar mill where our ancestors toiled for hundreds of years is also appalling. There are Indigeneous artifacts all over theta property-I am sure many have yet to be discovered.”

Correspondence ID: 1094 **Comment ID:** 1166607

Comment Text: “Money earned by the operators of a Caneel like resort will be sent offshore, not unlike what happened with slavery. The resources related to the park or produced by the Park benefit corporations or most likely white upper class business owners and not native and black or Hispanic St Johnians.”

Correspondence ID: 1119 **Comment ID:** 1167164

Comment Text: “We have observed that there are many St. John residents running VRBOs. We believe that the existing hotels, the Cinnamon Bay campground, and these VRBOs provide adequate lodging options in a variety of prices ranges on St. John. Also, St. John is a small island. Will a large new resort overburden the island's resources?”

Correspondence ID: 953 **Comment ID:** 1166044

Comment Text: “ST JOHN HAS ENDURED A SEVERE LABOR SHORTAGE FOR THE LAST 2 YEARS. (ASK ANY BUSINESS OWNER). THIS IS BECAUSE SO MUCH LONG TERM HOUSING ON ST JOHN HAS BEEN CONVERTED TO SHORT TERM VACATION RENTALS. AND SO MUCH LONG TERM HOUSING HAS NOT BEEN REBUILT AT ALL, GIVEN THE COST OF CONSTRUCTION ON ST JOHN, ARGUABLY THE HIGHEST UNDER THE US FLAG.. (I KNOW, HAVING ONCE BEEN IN THE CONSTRUCTION BUSINESS HERE MYSELF). THOUSANDS HAVE FLED THE ISLAND AFTER IRMA/MARIA OF 2017. (SEE THE 2020 CENSUS). THE 500 WORKERS NEEDED TO TO STAFF SUCH A HOTEL ARE LONG GONE. HOTEL WORKERS ARE NOTORIOUSLY LOW PAID. (THE COST OF LIVING ON ST JOHN IS THE HIGHST UNDER THE US FLAG). THEY WILL BRING IN MANAGERS FROM THE STATES. THEY WILL NOT HIRE LOCALLY FOR THE GOOD JOBS. CANEEL HOTEL MANAGEMENT COMPANIES HAVE BEEN BAD CORPORATE CITIZENS, CLOSING DOWN FOR 2 MONTHS EACH YEAR, WHEN WORKERS DO NOT GET PAID. THEY HAVE BLOCKED ACCESS TO CANEEL WITH THAT GUARD HOUSE AND BY CHARGING \$20 TO PARK. PRIVATE ENTERPRISE IS NOT THE ANSWER AT CANEEL BAY”

NPS RESPONSE: *As discussed in the Socioeconomics section (pages 40-44) and Future Commercial Opportunities section (pages 15-16) of the Environmental Assessment (EA), the proposed development would focus on providing economic opportunities to local community members. The request for proposal (RFP) would encourage developers to employ Virgin Islanders at every level of the operations and management and to procure supplies and services from local businesses and vendors. The redevelopment of lodging and amenities and restoring access to the Caneel Bay area would provide economic benefits to the local community through increased visitation to the island, increased access to employment at the site, and opportunities for local businesses to contribute to the operation of the Caneel Bay area. For future commercial opportunities, local businesses of the Caneel Bay area would be encouraged to create meaningful employment opportunities, such as creating management roles for local residents. The NPS would seek to partner with a developer/operator that intends to work closely with the community and would prioritize a workforce from the local community as much as possible. This approach would include the use of Virgin Islanders for the workforce to the maximum extent practicable, consistent with the NPS*

responsibility under the 1978 congressional mandate (16 United States Code 398(d)(b) and Public Law 95-348). To address housing shortages on St. John, the NPS would work with the developer to consider the need for additional employee housing and, if appropriate, would incorporate such housing into the developer's redevelopment plans.

IS1300 Issues and Impacts Topics: Archaeological Resources and Historic Structures and Districts

CONCERN STATEMENT: *Commenters questioned the impact on cultural resources for both Alternatives A and B. Some commenters wished to see historic preservation occur under Alternative A, while other commenters requested more assessments of cultural resource impacts and outside agency coordination prior to the proposed development.*

Representative Quotes:

Correspondence ID: 1039 **Comment ID:** 1165781

Comment Text: "Under Alternative A, isn't there a way we can preserve the buildings? Why does it only have to occur under Alternative B?"

Correspondence ID: 1049 **Comment ID:** 1165797

Comment Text: "Do we know which historic structures would be removed? Can the structures from the colonial era be removed? What qualifies as a historic structure? Even if the historic structures meet the SOI qualifications, can they still be removed?"

Correspondence ID: 975 **Comment ID:** 1166052

Comment Text: "Plan B pushes for preserving and maintaining all historic buildings, including hotel rooms built in the 1950s. There is not much in the proposal about the federal law citing the criteria for any building to be designated historic. However, those rooms were updated and renovated numerous times for telephone and cable access. What are we saving and why? One structure is enough to show how the "resort" accommodated rich people during their stay. But to what purpose?"

Correspondence ID: 1006 **Comment ID:** 1166306

Comment Text: "Regarding environmental consequences, as noted on page 31, paragraph 5 "Mothballing the Historic" structures on this site or similar NPS action deemed to have an adverse impact to the historic district would be unnecessary and is not recommended. Long term preservation of the historic district through adaptive reuse of some buildings and rehabilitating some elements of the historic landscape is not exclusive to Alternative B. The reused building would be of greater community value as VINP interpretive centers than as part of a modern day exclusive eco-resort the island no longer needs."

Correspondence ID: 1094 **Comment ID:** 1166612

Comment Text: "It is well known that human remains have been found at Caneel. It is anticipated that further remains will be uncovered with any development. That would included

remains from people who lived on St John before Europeans came to St. John and the remains of people enslaved. I contend it will be impossible to comply with existing statutes and regulations regarding such artifacts and human remains if development is permitted.”

Correspondence ID: 1102 **Comment ID:** 1166739

Comment Text: “The cultural resource studies are critically important. It would seem important to undertake these assessments before there is an agreement with a potential concessionaire, who would then know what resources must be preserved, protected, maintained and restored.”

Correspondence ID: 1104 **Comment ID:** 1166906

Comment Text: “EPA recommends that all reports developed throughout the VI State Historic Preservation Office (VISHPO) compliance process be made available for public comment when concurrently submitted to the VISHPO for review.”

Correspondence ID: 1104 **Comment ID:** 1166907

Comment Text: “EPA recommends that ongoing coordination with territory-recognized indigenous group(s) continue through the request for proposals, design selection and implementation phases to ensure that the project meets VISHPO guidelines.”

NPS RESPONSE: *Under the no-action alternative, the NPS would conduct additional surveys in the future planning process to evaluate the conditions of historic resources and the status of the buildings and structures that contribute to the Caneel Bay Historic District. As described in the mitigation measures for the preferred alternative in the Environmental Assessment (EA; pages 19-21), the NPS would conduct a detailed assessment under 36 Code of Federal Regulations Part 800 in the future planning process. Detailed documentation of historic and archeological resources would occur through agency coordination with the USVI State Historic Preservation Officer. This documentation would include resources identification and develop design guidelines for the preservation, rehabilitation, and treatment of historic resources and archeological monitoring. A recent example where the NPS completed a large-scale archeological survey in consultation with the VI SHPO was the redevelopment of Cinnamon Bay. The NPS goal under the preferred alternative would be to build upon that success and take a similar approach.*

IS1600 Issues and Impacts Topics: Other (Traffic, wildlife etc.)

CONCERN STATEMENT: *Commenters expressed concern regarding the potential impacts on the natural environment (wetlands, wildlife, and vegetation). Other commenters stated that the project would generate additional waste that could be damaging to the environment. Some commenters recommended green technologies and environmentally friendly ways to address potential impacts from the project.*

Representative Quotes:

Correspondence ID: 11 **Comment ID:** 1163301

Comment Text: “However, if we are truly forward looking, and honest with ourselves with respect of our duties here, there is only one choice - BAN ANY DEVELOPMENT. Biodiversity loss is a critical problem for the planet, hopefully this is not news to you. Loss of biodiversity not only has a biological impact, it will have a massive ECONOMIC impact on this very region as well

- and not in 30 years, in the next FIVE years. See notes from the recent Montreal biodiversity COP15.”

Correspondence ID: 1094 **Comment ID:** 1166604

Comment Text: “the beaches. k. Evidence is developing that the human waste from tourists using the beaches along with the medications excreted into the water are affecting wildlife, particularly turtles. l. Turtle nesting grounds exist at Caneel. The development of a resort endangers a protected species.”

Correspondence ID: 1103 **Comment ID:** 1166755

Comment Text: “Buying green, reducing waste, and recycling: We encourage NPS to provide detailed guidance, or specific concession or lease terms where possible, to ensure that the purchase of environmentally friendly products is prioritized, and that waste prevention, reduction, and recycling measures are designed and implemented through innovative infrastructure and operations planning. Given that waste management infrastructure is severely limited on St. John, and waste needs to be shipped to a dump on St. Thomas that has been a site of serious environmental concern given its many prior violations of environmental regulations, the topic of waste management from any proposed development and subsequent operations should be proactively assessed with clear and stringent guidance provided by NPS in the next stage of its planning process.”

Correspondence ID: 1103 **Comment ID:** 1166757

Comment Text: “We encourage NPS to direct any future developers or operators to ensure that native, regionally-sourced plant stock is utilized for all landscaping purposes. If insufficient native plant stock is available, we encourage NPS in their natural resource leadership role to explore local partnership possibilities to help increase the cultivation of locally native species. Furthermore, no invasive or potentially invasive plant species should be permitted to be utilized in landscaping, and the current opportunity to replace any existing landscaping at Caneel that consists of invasive exotic species should be utilized, with invasive plants removed and replaced with native species. This oft-overlooked area of green practices is especially important in St. John, which has been hit so hard with invasion of exotic plant species following natural area fragmentation and disturbance in part caused by the destructive hurricanes of 2017.”

Correspondence ID: 1104 **Comment ID:** 1166851

Comment Text: “Appendix B states that two wetland areas have been detected at the site. Both wetland areas were originally salt ponds/mangrove basins that were filled for the development of the resort prior to the institution of the Clean Water Act and were thus grandfathered. NPS states that these two areas have begun to revert to wetland conditions after the closure of the resort in 2017. o EPA concurs with the NPS determination to avoid work in these areas as part of the resort redevelopment. However, EPA believes that the sites should be formally delineated to determine their extent and to examine their condition. o These areas may represent excellent opportunities to mitigate for environmental impacts at the site, since they can be enhanced to facilitate the reestablishment of wetland conditions while enhancing their functions and values

as natural resources. These areas may also be used for public education on the values and functions of wetlands.”

Correspondence ID: 1103 **Comment ID:** 1166756

Comment Text: “There is increasing momentum for eliminating the sale and distribution of single-use plastics and polystyrene foam products in national parks, as evidenced by a detailed letter submitted to Secretary Deb Haaland last July, and a clear opportunity for NPS to facilitate installation of drinking water stations and the exclusive sale of reusable water bottles (instead of single-use bottles) on-site in order to significantly reduce plastic bottle waste generation at the future redeveloped Caneel Bay.”

***NPS RESPONSE:** The Environmental Assessment (EA) analyzes impacts to the natural environment (wetlands, wildlife, and vegetation) in Appendix B (pages B-1-B-14). Impacts to vegetation, wetlands, wildlife, and threatened and endangered species and their habitat have the potential to occur from construction-related disturbances, grounds maintenance and human activities in the Caneel Bay area. The NPS would seek to avoid or minimize impacts to natural resources from redevelopment activities according to NPS Management Policies, the NPS Organic Act and other relevant laws, policies, and regulations in the future redevelopment process. Any future redevelopment would follow requirements of applicable or relevant and appropriate requirements regarding air emissions, site disturbance, erosion controls, and disposal of waste. Future commercial operations at the site also would be conducted consistent with the NPS Green Parks Plan. The Green Parks Plan establishes goals to reduce greenhouse gas emissions in the Park, buy green products, reduce, reuse, and recycle, and green the grounds along with other green goals, as described in the EA (page 16).*

***CONCERN STATEMENT:** A commenter suggested that proposed development should be analyzed for potential impacts to Environmental Justice populations. The commenter recommended that community input be integrated into development and provided resources to better integrate the need of Environmental Justice populations into the project.*

Representative Quotes:

Correspondence ID: 1104 **Comment ID:** 1166879

Comment Text: “Building on EO 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" signed by President Clinton in 1994, President Biden signed EO 14008, "Tackling the Climate Crisis at Home and Abroad" in January 2021. o While mentioning economic benefits, this current EA does not appear to acknowledge potential short and long-term impacts that may be experienced by neighboring communities to Caneel Bay due to redevelopment including increased traffic and its impact on existing infrastructure on the island. o A few of these neighboring communities are low-income and/or minority populations, therefore impacts should be discussed and mitigated through an environmental justice framework. o As EPA continues to develop policies and tools to support federal partners, we invite NPS to engage with Region 2's Community Engagement and Environmental Justice Team to discuss potential mitigation throughout the project development process.”

Correspondence ID: 1104 **Comment ID:** 1166902

Comment Text: “EPA encourages NPS to incorporate community feedback gathered throughout the NEPA process into the final design, including: o Selecting final design plans that include community-accessible spaces in addition to the "day use" beach access such as a community center and access to historic and environmental resources such as all park trails that connect to Caneel Bay.”

Correspondence ID: 1104 **Comment ID:** 1166905

Comment Text: “EPA recommends NPS consider applying for EPA’s Recreation Economy for Rural Communities Technical Assistance which helps communities develop strategies and an action plan to revitalize their Main Street through outdoor recreation. o Eligible applicants include local governments, Indian tribes, and nonprofit institutions and organizations representing any community in the United States. This technical assistance could be a component of a robust civic engagement process moving forward. o <https://www.epa.gov/smartgrowth/recreation-economy-rural-communities>”

***NPS RESPONSE:** As discussed in Appendix B of the Environmental Assessment (EA; pages B-9-B-10), the NPS follows Executive Orders (EO) 12898 and 14008 which directs federal agencies to make achieving environmental justice part of its mission. As discussed on the Socioeconomics section of the EA (pages 42-44), redevelopment of the Caneel Bay area would create construction jobs along with opportunities for ancillary trade and wholesale businesses in the USVI. Additional jobs would be generated as a result of the development of the site through hospitality needs, the needed for additional transportation, and support local vendors and businesses to maintain operations. The NPS recognizes the past inequalities at the previous resort related to limited public access and the recent increases in unemployment and inflation. Impacts to minority and low-income populations would be further evaluated in the future redevelopment planning phase. The NPS would seek input from the community during future outreach efforts associated with the preferred alternative to address the needs of those who may be affected by environmental justice concerns. The NPS has shared the technical assistance opportunities for robust civic engagement, such as the EPA Recreation Economy for Rural Communities, with eligible local partners in the US Virgin Islands.*

ED1000 Data, References, Figures, Request for Information

***CONCERN STATEMENT:** Commenters requested additional information regarding the project, or that additional data be incorporated into the analysis, including:*

- *Document existing damages to buildings, grounds, and beaches*
- *Include recommendations for additional alternatives or concepts that were suggested during civic engagement*
- *Analysis of the carrying capacity of Virgin Islands National Park*
- *Demonstrate the economic value of the park with hotels versus without hotels*
- *Economic analysis on pricing variance brought to the island under the different alternatives*
- *Data on the number of visitors to the island since the 2017 Hurricanes when the resort closed*
- *Updated visitor data reflecting the easing of the COVID pandemic restrictions*
- *Information regarding the potential ownership of the proposed buildings*
- *Clarification on maps and graphics*

- *Analysis of a wider range of alternatives*
- *Provide more information on climate resiliency*
- *Provide more detail on the recommended mitigation measures*
- *Conduct a “necessary and appropriate use” analysis*
- *Conduct a vulnerability assessment / Coastal Facility Vulnerability Assessment*
- *Provide detailed maps showing vulnerability to climate change impacts*
- *Reanalyze the topics that were considered but dismissed from detailed analysis*
- *Review information regarding natural and non-structural features to protect from coastal hazards*
- *Provide additional information regarding the landfill adjacent to Honeymoon Beach*

Representative Quotes:

Correspondence ID: 1101 **Comment ID:** 1166734

Comment Text: “The speculation that Alternative B will increase tourism also raises alarm bells. What is the carrying capacity of the VINP? That Caneel should be returned to the state “envisioned by Laurence Rockefeller” never seems to take into account that the 1950s did not see the overuse St. John is currently experiencing.”

Correspondence ID: 805 **Comment ID:** 1165952

Comment Text: “I would be interested in the economic analysis on pricing variance brought to the island in various options and how well that was analyzed. I would assume everyone who stayed at Caneel will worst case go to Little Dix and spend money with the locals at Virgin Gorda vs St Johns with whatever option is decided there.”

Correspondence ID: 290 **Comment ID:** 1166007

Comment Text: “How many people have visited the island since 2017 when the resort closed. How did that become equitable for anyone, nevermind the people that worked there or closed business because of the lack of resort. Let them be the ultimate arbiters of their preference.”

Correspondence ID: 990 **Comment ID:** 1166258

Comment Text: “The second paragraph does acknowledge that the economy had recovered somewhat from the hurricane (and pandemic) by 2021, but it is still misleading. It does not show data from 2022 as the pandemic restrictions were eased, Cinnamon Bay Campground re-opened, and St. John's economy surged. It does not give an accurate picture of what the economy is like now, during high season in 2023.”

Correspondence ID: 1010 **Comment ID:** 1166339

Comment Text: “The most important information that I feel is missing from the EA is whether the proposed new resort buildings would be owned by the NPS or the concessionaire. Also, would maintenance of the new resort buildings be the responsibility of the NPS or the concessionaire.”

Correspondence ID: 1010 **Comment ID:** 1166360

Comment Text: “Your map is very unclear. Do the orange Interpretive Zone and the brown Operations Zone overlap, or are they two separate areas?? Why are there two “potential Community Areas”? What does that term mean and what sort of activities would go on there?? Are we talking about an auditorium where Rangers give talks that also is used for community meetings? How could you provide enough parking for a community meeting, while guests are using most of the parking spots? Would the “community” take buses to these Community Areas? Why is one at the beach, is that for school groups? It seems there are other beaches that could be used by school groups? The reasons to create “Community Areas” are totally unclear to me.”

Correspondence ID: 1103 **Comment ID:** 1166744

Comment Text: “We appreciate that NPS previously explored three preliminary alternatives (in addition to the no-action alternative) for Caneel Bay at an earlier pre-NEPA stage in the planning process, in order to garner public feedback that helped to inform the development of the current EA. The current EA advances only one preferred alternative and compares this with the no-action alternative; we therefore believe that NPS missed an important opportunity to describe, analyze, and publicly disclose additional alternatives.”

Correspondence ID: 1103 **Comment ID:** 1166747

Comment Text: “the rudimentary mitigation recommendations made in the EA for protecting the park’s viewsheds and dark night skies as “fundamental resources and values that contribute to the Park’s purpose” are positive, but should be elaborated upon and articulated with far better specificity in the next phase of redevelopment planning.”

Correspondence ID: 1103 **Comment ID:** 1166758

Comment Text: “A vulnerability assessment should be conducted for VIIS, or at minimum, a preliminary Coastal Facility Vulnerability Assessment in alignment with NPS standards should be conducted for the Caneel Bay site, with analysis and disclosure of the results of a preliminary study shared with the public, to ensure that best available information and practices are used to inform robust, climate-ready alternatives in future planning documentation.”

Correspondence ID: 1104 **Comment ID:** 1166908

Comment Text: “According to the EA and Appendix B, the 2012 Environmental Site Assessment revealed contamination at the landfill adjacent to Honeymoon Beach. The proposed action would include removal of the landfill. EPA requests more information on the proposed methods for decommissioning the landfill be discussed in future NEPA compliance processes as determined by NPS, to include responses to the following questions: o When was this landfill in use? o If no longer in use, when did it cease receiving waste? o What types of wastes were disposed of in this landfill? o Was any closure of this landfill attempted to date? o How would closure of this landfill impact the short-term and long-term waste management strategy on St. John?”

Correspondence ID: 1104 **Comment ID:** 1166854

Comment Text: EPA shares the following resources, which includes information on natural and non-structural features to protect areas from coastal hazards. This may be useful in the redevelopment of the resort, as discussed in previous meetings:

o Urban Runoff: <https://www.epa.gov/nps/urban-runoff-low-impact-development>

o Coastal Risk Reduction and Resiliency (USACE):

https://www.usace.army.mil/corpsclimate/climate_preparedness_and_resilience/coastal-Risk-and-Reduction-and-Resilience/

NPS RESPONSE:

The NPS appreciates the additional ideas and requests for further information. The NPS summarizes information used in the Environmental Assessment (EA) to inform its decision and disclose potential impacts of the proposed action. The EA presents the latest data available at the time of the analysis used in its analysis. In accordance with Director's Order #12 and the NPS NEPA Handbook, the NPS goal is to provide a clear and concise EA that the general public can understand.

Alternative elements considered but not retained for detailed analysis are described in the EA (pages 23-25). The rationale as to why certain elements were not carried forward also is provided.

For this programmatic-level analysis, the NPS considered climate change, including storm surge and sea level rise in the suitability analysis and future resiliency planning, and consideration will be part of future phases of Caneel Bay area redevelopment.

Information on the site contamination is documented in the Engineering Evaluation/Cost Analysis (EE/CA) Report and its EE/CA Addendum found on PEPC, which was made publicly available at [ParkPlanning - Public Involvement for the Engineering Evaluation/Cost Analysis \(EE/CA\) Site Assessment at Caneel Bay Resort \(nps.gov\)](#).

The NPS would have overall responsibility for the Caneel Bay area, and through a commercial services contract, the developer/operator of the overnight lodging area would be responsible for its operations and grounds upkeep and maintenance as specified in the contract.

SR4000 Sustainability and Resiliency

CONCERN STATEMENT: *Commenters stressed the importance of making the project eco-friendly and suggested or requested environmentally sustainable development measures. Commenters also recommended ways in which development could better address climate change impacts.*

Representative Quotes:

Correspondence ID: 805 **Comment ID:** 1165943

Comment Text: "My vote: My only comments reading the limited options is to reestablish the Rockefeller resort design SAFELY WITHIN THE ENVIRONMENTAL requirements to protect the island/water ways as much as possible and NO CARBON footprint operation as this world will be there in 2030-2035 and 100% 2050 - (even with no wifi and no phones and no televisions as this was something many paid to have to disconnect from global stress and connect with nature

out of your room and donkeys and deer and mongoose, etc. There is a high price that many will pay to enjoy this little space and invigorate St John with \$ subsistence.”

Correspondence ID: 811 **Comment ID:** 1165965

Comment Text: “make it hurricane proof with solar energy as a major operating component, that would help those who aren’t the wealthiest to revisit or visit for the first time.”

Correspondence ID: 1103 **Comment ID:** 1166752

Comment Text: “We urge NPS to explore innovative ways to fully maximize the sustainability of the future redevelopment and to utilize this opportunity to demonstrate genuine environmental leadership at Caneel Bay, with a special emphasis on sustainable building and waste prevention and management. The EA states that “[c]ommercial operations at the site would be conducted in a manner consistent with NPS vision for long-term sustainable operations outlined in the Green Parks Plan... Developers/operators would be selected through a competitive commercial services process by the NPS and an ability to meet the sustainability goals would be considered during evaluations.” This is an alarming downgrade from what NPS previously noted in their Caneel Bay Redevelopment Newsletter of 2022 wherein they stated that “[developers/operators].. would be required to demonstrate their ability to execute a sustainable commercial operations.” Prioritization of sustainability must be upgraded once again in this planning effort. Given that the Virgin Islands are among the most climate-threatened insular areas in the country, as well as being an iconic tourism destination, we believe that systematic consideration of innovative ways to maximize the sustainability of any future redevelopment and associated commercial operations should be undertaken by NPS, and that the agency should provide the most stringent requirements and guidelines possible to future developers/operators to ensure compliance with a high sustainability standard.”

Correspondence ID: 1104 **Comment ID:** 1166848

Comment Text: “• EPA recommends that NPS require potential developers comply with Executive Order (EO) 14057: "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability." o Requests for proposals for the design and construction of the buildings should follow US General Services Administration's requirements for every federal project <https://www.gsa.gov/real-esatate/design-and-construction/engineering-and-architecture/facilities-standards-p100-overview> o EPA's Recommendations of Specifications, Standards, and Ecolabels that is designed to help federal purchasers identify and procure environmentally sustainable products and services. These recommendations can be a guide for any rehabilitation/construction at VINP to help achieve the goals set out by EO 14057. o EPA's Energy Star Target Finder Calculator may be a resource to support compliance with EO 14057. Target Finder helps architects, engineers, and property owners and managers assess the energy performance of commercial building designs and existing buildings. https://www.energystar.gov/buildings/resources_audience/service_product_providers/commercial_new_construction/target_finder”

Correspondence ID: 1104 **Comment ID:** 1166819

Comment Text: “EPA encourages NPS to incorporate a Harbor Resilience Center (aka "resiliency hub") on the Caneel Bay site to operate as a community resource for response to climate change impacts and potential future disasters on St. John.

Correspondence ID: 1104 **Comment ID:** 1166933

Comment Text: “EPA commissioned a Sustainable Materials Management (SMM) Analysis after Hurricanes Irma and Maria specifically for the Virgin Islands and published in March 2021. We have attached this report to our detailed comments for your awareness and support. Our SMM staff are available to respond to any other requests for collaborative efforts as the proposed action moves forward, especially considering EPA's \$10M grant to Virgin Islands Waste Management Authority to address disaster debris.”

***NPS RESPONSE:** The preferred alternative incorporates development that would be commensurate with an eco-resort consistent with the past uses of the site. As described in the Environmental Assessment (EA; page 16), operations at the site would be conducted consistently with NPS's vision for long-term sustainable operations, as documented in NPS's Green Parks Plan Third Edition (2023). The NPS strives to align the NPS initiatives with Executive Order (EO) 13693: Planning for Federal Sustainability in the Next Decade and EO 14057: Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability and related mandates. Goals specific to the Caneel Bay area operations include to continuously improve environmental performance, be climate friendly and climate ready; be energy smart; be water wise; adopt greener transportation methods; preserve outdoor experiences; buy green products; reduce, reuse, and recycle; and green our grounds. The NPS understands the importance of addressing the effects of climate change in its planning and the EA considers these effects in the analysis. One of the objectives for the preferred alternative is to design the facilities to be resilient to more severe storms and sea level rise (page 27). Future developers/operators would be selected through their ability to meet sustainability goals in a competitive commercial services request for proposal (RFP) process. The NPS would work with the future developer/operator on sustainable practices during the implementation of a redevelopment plan.*

PN1000 Purpose, Need, and Objectives

***CONCERN STATEMENT:** Commenters disagreed that overnight accommodations would support the purpose and need and should not be offered at Caneel Bay. Some commenters stated that the development of the 'need' was not the original intention of the retained-use estate (RUE) to end the operation of a resort and for the Secretary of the Interior to assume responsibility of the site for the use and enjoyment of visitors to the park. Other commenters question if the project would address the 'purpose' of providing benefits to the St. John community when providing luxury accommodations would potentially continue to restrict access to Caneel Bay and now that the overnight accommodation needs has been absorbed by the local rental community and overnight accommodations are no longer needed at Caneel Bay.*

Representative Quotes:

Correspondence ID: 980 **Comment ID:** 1166133

Comment Text: “You have stated that the original agreement was to expire in 2023 and the property revert to the NPS control for integrating into the VINP. The very definition of the VINP

is as you state "to preserve and protect for PUBLIC BENEFIT..." How is a privately run eco luxury lodge that restricts access to only its high paying guests a "public benefit"?"

Correspondence ID: 1064 **Comment ID:** 1166387

Comment Text: "Responding to the above purposes, I agree that those purposes apply to the Virgin Islands National Park as a whole, BUT this doesn't mean that each segment of the VINP must satisfy all of these purposes. To extrapolate number 3 regarding overnight and day-use opportunities, this would mean that there would be overnight opportunities or accommodations throughout the Park. So, I disagree that overnight opportunities and accommodations should be offered at Caneel. I agree with purposes 1 and 2, and believe that these statements could be applied throughout the NPS system of parks."

Correspondence ID: 1094 **Comment ID:** 1166600

Comment Text: "September 30, 1983 is especially enlightening in my opinion with regard to Mr. Rockefeller's view of what should happen in 2023. The land known as Caneel was transferred by Mr. Rockefeller on page one in paragraphs A, B, C without restriction or condition. The reservation of the right to use Caneel occurs in a later paragraph. The reservation of rights could have been designated in the initial "grant" or transfer section which would have elevated the right to continue to use the Caneel property. b. Paragraph 1 on page 2 of the RUE clearly established a term of forty years without an ability to continue the RUE. The only reasonable reason to do that is Mr. Rockefeller did not intend that the RUE would continue beyond 40 years and any proposal to continue Caneel as a resort by establishing a new vendor for a hotel would be inconsistent with a term of 40 years. Simply, if Mr. Rockefeller had intended to provide for the continuation of a resort like Caneel or Caneel, he would have provided for a means to extend the RUE or directly stated that upon the termination of the RUE a resort would be a preferred alternative. c. Paragraph 2 on page 2 contains strong and direct language regarding the land known as Caneel: It is the Grantor's expectation and intention that at some future time, to be determined by Grantor pursuant to the provisions set forth herein, the Retained Use Estate will be terminated and extinguished in order to carry out the longstanding objective of Grantor that the Premises ultimately be an integral part of the Virgin Islands National Park (the "Park") under the jurisdiction of the Secretary for the use and enjoyment by visitors to the Park of the outstanding scenic and other features of national significance located both within the Premises and in other areas of the Park. Emphasis added. The Caneel property from before 1983 to the present was only used or operated as a resort. If the RUE is terminated the intent was clearly not to continue the operation of a resort or MR. Rockefeller would have made the RUE renewable for an unlimited period of time."

Correspondence ID: 1094 **Comment ID:** 1166602

Comment Text: "When the Caneel resort was created the options for staying on St John were limited. A recent economic study commissioned by the Friends of the Park establishes that there are over 1000 homes on St John currently offered to the public for accommodations. There is no longer a need for the type of lodging offered by a resort."

NPS RESPONSE: *As stated in the Environmental Assessment (EA) on page 5, the purpose and need of the project is “to identify a sustainable and resilient redevelopment strategy for the Caneel Bay area that (1) integrates the value and history of the community of St. John; (2) preserves and protects its significant cultural and natural resources; (3) provides a range of visitor experiences, **including overnight** and day-use opportunities; and (4) promotes economic activities” (Emphasis added in **BOLD**).*

Overnight accommodations are addressed as one of the project purposes. The NPS utilized an interdisciplinary approach informed by the views of the public through civic engagement to develop the purpose and need statement for the EA. As stated in the EA, action is needed to make the area accessible and welcoming to the local community, overnight lodging guests and park visitors once the retained-use estate (RUE) expires, on September 30, 2023. After that date, all commitments and stipulations of the RUE are no longer in effect and the NPS would manage the site according to the NPS Organic Act, Management Policies and other relevant laws, regulations, policies and guidance.

Chapter 3 of the EA describes the impacts of the two alternatives on the community of St. John. This analysis evaluates both the adverse and beneficial impacts of the alternatives on the local community, including impacts on the historic district at Caneel Bay, floodplain impacts should a future developer build within the floodplain, the socioeconomic impacts, and impacts on visitor use and experience.

The nature and type of overnight accommodations was not considered in this programmatic analysis. The NPS has made no determinations on the types of overnight accommodations that would be available at the site (i.e., more primitive experience versus more luxurious) and these determinations would be made at a later date in coordination with potential developers following additional analysis.

The need to offer overnight accommodations at Caneel Bay has been one of the most commented aspects during both civic engagement and during the EA public comment period. The NPS recognizes that local rentals have helped absorb some the overnight needs of visitors to St. John, but they have not satisfied all of the on-going needs for lodging. The NPS has evaluated both a redevelopment and no-redevelopment alternative, therefore the analysis sufficiently analyzes the full spectrum of potential effects. In addition, overnight accommodations has been a long-term, established, and expected use of the site by visitors coming to Caneel Bay. Therefore, NPS believes that overnight accommodation is a reasonable action to consider in the range of alternatives.

Public access areas would be negotiated and coordinated in any future potential redevelopment proposals with a developer/operator, as described in the EA (page 13). The NPS identified several additional opportunities within the EA that will be implemented with additional beach access and conservations zones (page 12).