

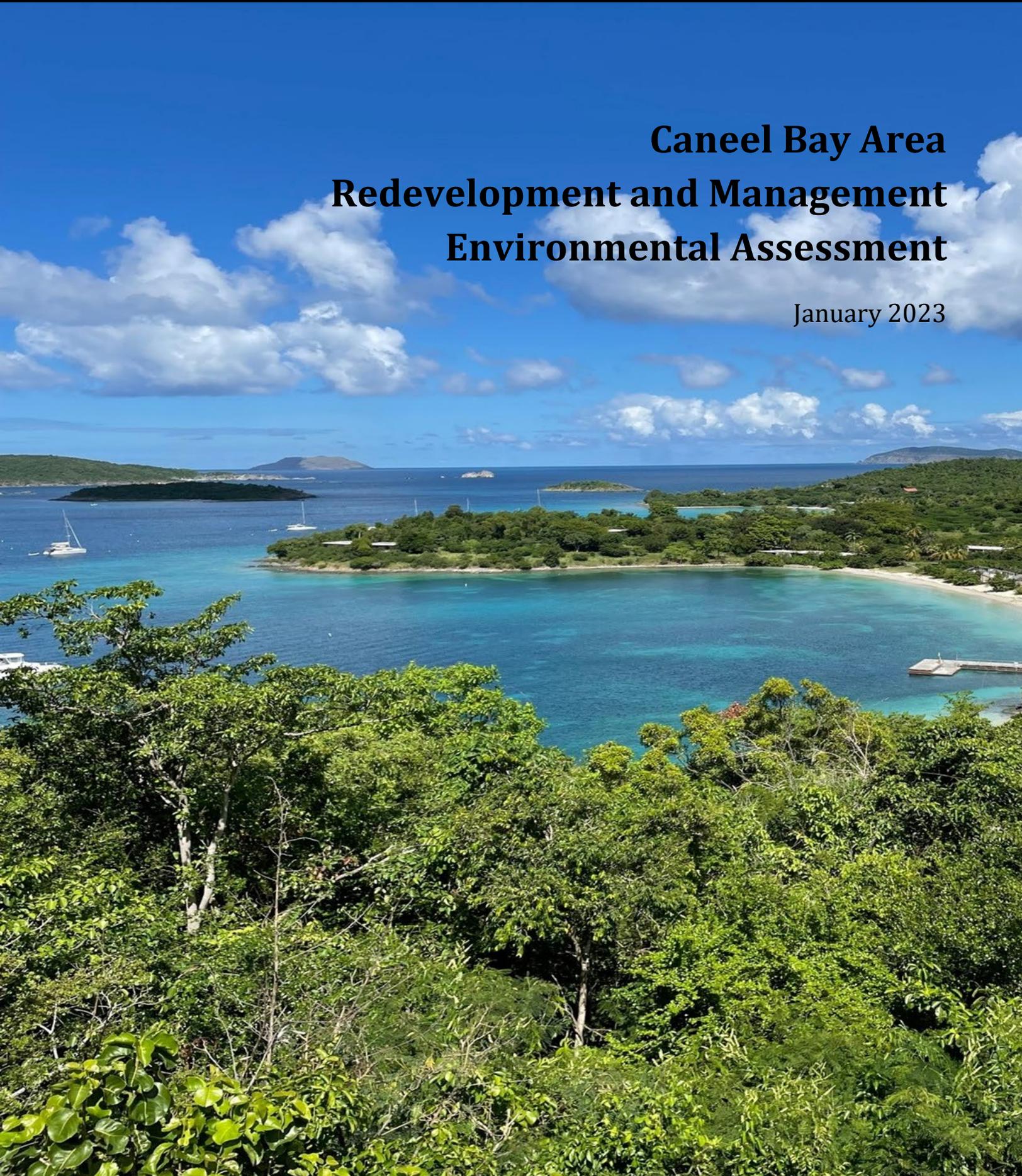
National Park Service
US Department of the Interior

Virgin Islands National Park
St. John, US Virgin Islands



Caneel Bay Area Redevelopment and Management Environmental Assessment

January 2023



This page intentionally left blank

ACRONYMS AND ABBREVIATIONS

APE	area of potential effect
BMP	best management practice
c.	circa
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CUA	commercial use authorization
DO	Director's Order
EA	environmental assessment
EE/CA	Engineering Evaluation/Cost Analysis
EFH	essential fish habitat
EO	Executive Order
ESA	Environmental Site Assessment
FAQ	Frequently Asked Questions
FEMA	Federal Emergency Management Agency
GMP	general management plan
HABS	Historic American Building Survey
HALS	Historic American Landscapes Survey
historic district	Caneel Bay Historic District
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
PA	Programmatic Agreement
Park	Virgin Islands National Park
PEPC	Planning, Environment, and Public Comment
PL	Public Law
Q&A	question-and-answer
REC	Recognized Environmental Condition
resort	Caneel Bay Resort
RFP	request for proposal
RUE	Retained Use Estate
US	United States
USACE	United States Army Corps of Engineers
USC	United States Code

USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USVI	United States Virgin Islands
VI	Virgin Islands
VI DPNR	Virgin Islands Department of Planning and Natural Resources
VI SHPO	Virgin Islands State Historic Preservation Officer
VINP	Virgin Islands National Park
WAPA	Water and Power Authority

TABLE OF CONTENTS

CHAPTER 1: PURPOSE AND NEED	1
Introduction.....	1
Study Area	2
Purpose and Need for Action.....	5
Impact Topics Retained for Detailed Analysis	6
CHAPTER 2: ALTERNATIVES	8
Alternative A: No-Action (No Redevelopment).....	8
Alternative B: Proposed Action/Preferred Alternative (Redevelopment).....	9
Mitigation Measures.....	19
Alternative Elements Considered But Dismissed From Detailed Analysis.....	23
CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES	26
Introduction.....	26
Historic District.....	28
Floodplains.....	34
Socioeconomics	40
Visitor Use and Experience	44
CHAPTER 4: CONSULTATION AND COORDINATION	49
Public Participation and Civic Engagement.....	49
Agency Consultation	51
REFERENCES.....	53

LIST OF FIGURES

Figure 1. Damage to the Caneel Beach Cottages and Grounds Following Hurricane Irma in 2017	2
Figure 2. Caneel Bay Area Redevelopment and Management Study Area and Area of Potential Effect	3
Figure 3. Alternative A: No Action (No Redevelopment)	10
Figure 4. Alternative B: Proposed Action/Preferred Alternative (Redevelopment).....	11
Figure 5. Redevelopment Suitability Analysis	18
Figure 6. Condition of the Scott Beach Cottages (2021)	35
Figure 7. Flood Hazard Areas	36

LIST OF TABLES

Table 1. Issues and Impact Topics Retained for Detailed Analysis.....	6
Table 2. Management Zone Descriptions	12

LIST OF APPENDICES

Appendix A: Draft Programmatic Agreement

Appendix B: Environmental Issues and Topics Considered but not Retained for Detailed Analysis

Appendix C: Additional Information Regarding Community Engagement with the Environmental Investigation at Caneel Bay 2021-2022

CHAPTER 1: PURPOSE AND NEED

INTRODUCTION

Established in 1956, Virgin Islands National Park (VINP or “Park”) is located predominantly on the island of St. John in the United States Virgin Islands (USVI). The Park was created through a donation of more than 5,000 acres of land in 1956 to the National Park Service (NPS) from Laurance Rockefeller. Today, the St. John portion of the Park encompasses 7,259 acres of terrestrial and shoreline habitat and 5,650 acres of adjacent submerged lands (NPS 2018). As described in the Park’s Foundation Document, the purpose of VINP is “to preserve and protect for public benefit and inspiration outstanding scenic features, Caribbean tropical marine terrestrial ecosystems in their natural conditions, and cultural heritage from pre-Columbian through Danish colonial times” (NPS 2016a). The Park also provides a setting for exploring the experience of enslaved Africans and learning about the layers of history and patterns of change within the institution of slavery over time in the West Indies when the Triangle Trade flourished (NPS 2016a).

In the mid-1950s, Laurance Rockefeller established the Caneel Bay Resort (resort) as an early model of ecotourist luxury accommodations to highlight the natural beauty of St. John. In 1983, Jackson Hole Preserve, Inc., an organization established by Laurance Rockefeller, donated the roughly 150-acre property to the NPS for inclusion within the Park, subject to a Retained Use Estate (RUE). The RUE allows its operator to use the property as a resort until September 30, 2023. At that time, the NPS will be responsible for managing the Caneel Bay area and integrating the roughly 150 acres into VINP (NPS 2016a).

The resort was operated continuously from the 1950s through 2017, when the resort closed due to damage from Hurricanes Irma and Maria. Prior to the hurricanes, the property was operating as a luxury resort with approximately 100 buildings and structures used for lodging (166 guest rooms), events, food services, recreation, maintenance, security, and utilities. Within the boundaries of the resort are culturally significant ruins and archeological sites that span the archaic period (500 years before the common era into the Taino period ending in 1450 after the common era), then through European colonialism (late 1600s) and post-colonial emancipation from 1848 into the 1940s and 1950s when the establishments of the resort and national park ushered in the mid-century tourism-based economy. Elements of the resort property were determined by the NPS to be eligible for listing in the National Register of Historic Places (NRHP) as a historic district (NPS 2016a). The footprint of the historic district is the same as the approximately 150-acre RUE boundary. The term *eligible for inclusion in the NRHP* includes both properties formally determined as such in accordance with regulations of the Secretary of the Interior and all other properties that meet the NRHP criteria (36 Code of Federal Regulations [CFR] 800.16).

The redevelopment and management of the Caneel Bay area was the subject of an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) in 2013 in which the NPS considered entering into a long-term, non-competitive lease with the existing resort operator under the terms described in Public Law (PL) 111-261. However, the NEPA review process was never completed.



Figure 1. Damage to the Caneel Beach Cottages and Grounds Following Hurricane Irma in 2017

In 2017, two Category 5 hurricanes (Irma and Maria) hit the USVI and damaged the resort facilities and grounds (**Figure 1**). Limited repairs and improvements have been made to the resort since the 2017 hurricanes. As a result, the Caneel Bay area is no longer operating as a resort but is still under the management of the RUE holder and its sister entity. In July 2021, the NPS announced it would discontinue plans to redevelop the Caneel Bay area via a non-competitive lease as authorized under PL 111-261 and started a planning process for the Caneel Bay area as described in the “Scope of the Environmental Assessment” section in this chapter.

STUDY AREA

The study area (or area of analysis) for the EA includes the roughly 150 acres subject to the RUE and surrounding areas, as shown in **Figure 2**. This boundary also is the area of potential effect (APE) for the purposes of the assessment of effects to cultural resources and consultation requirements under Section 106 of the National Historic Preservation Act (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.

Virgin Islands National Park

Caneel Bay Area Redevelopment and Management Plan Study Area and Area of Potential Effect

National Park Service
U.S. Department of the Interior

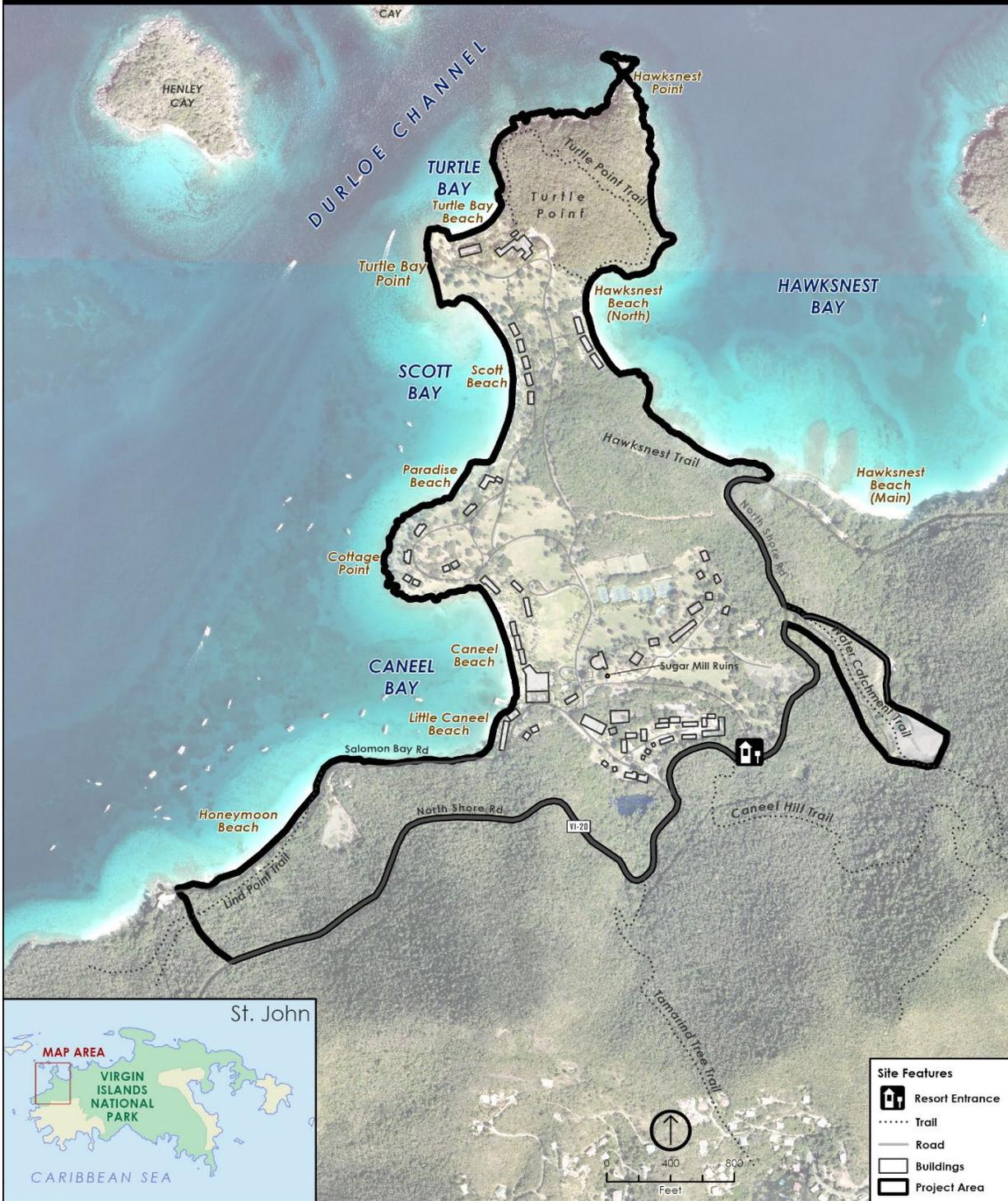


Figure 2. Caneel Bay Area Redevelopment and Management Study Area and Area of Potential Effect

SCOPE OF THE ENVIRONMENTAL ASSESSMENT

This EA is intended to be a planning level document using a programmatic approach. The term “programmatic” describes a broad or high level NEPA review and generally, this approach is used to assess the potential environmental impacts of proposed policies, plans, programs, or projects for which subsequent actions will be implemented (Council on Environmental Quality [CEQ] 2014). Subsequent actions may be subject to additional review under NEPA and could be tiered (40 CFR 1501.11) to this EA. A programmatic approach allows the NPS to assess the broad environmental impacts associated with the alternatives presented in Chapter 2 of this EA. This EA also sets forth conditions and mitigation that help shape the future vision for the site.

A programmatic approach is fitting as future redevelopment plans: (1) are dependent on the NPS conducting more detailed site-specific condition assessments for subsequent NEPA and NHPA analyses once full access is obtained; and (2) require more detailed redevelopment plans depending on the selected action, which would be created in collaboration with a future developer selected by the NPS through a competitive commercial services process.

The selected alternative would supplement the Park’s existing 1983 general management plan (GMP) by providing management guidance specific to the Caneel Bay area (NPS 1983). National park units can develop GMPs to meet broad NPS management goals or can develop more targeted plans to address specific park issues. These documents typically articulate management objectives, describe future conditions, and provide management guidance that meets the NPS GMP statutory planning requirements (54 USC 100502). The NPS takes a portfolio approach to general management planning, such that planning guidance can be provided through a GMP or any number of other documents that address statutory planning requirements parkwide or for a particular park area (NPS 2021a).

The VINP GMP was completed in 1983, and given the long-term RUE, the Park’s GMP did not provide specific management guidance for the Caneel Bay area, except to say that the operator “would continue private operations as long as compatible with park values.” Since the Caneel Bay area will be coming under the direct management of the NPS in 2023, this EA would supplement the Park’s GMP to provide specific management planning guidance for the Caneel Bay area as part of the Park’s overall planning portfolio. This EA addresses two of the GMP statutory requirements related to 1) the identification of measures for the preservation of the area’s resources and 2) the types and general intensities of development associated with public enjoyment and use of the area. Aspects related to the third GMP statutory requirement—identification of an implementation commitment for visitor carrying capacities for the area—will be addressed through future planning once the area reopens to the public and the NPS better understands how visitors use and enjoy the area and its resources. There is no need to evaluate the fourth GMP statutory requirement, which relates to potential modifications to external Park boundaries at the site.

Another key consideration for the scope of this EA is the assessment of the proposed undertaking on cultural resources. The NPS is separately, but concurrently, preparing a Programmatic Agreement (PA) to comply with the requirements of Section 106 of the NHPA, as amended, and its implementing regulations (36 CFR 800). The draft PA is provided as **Appendix A** of this EA and is also available for public comment.

In 2012, Barksdale & Associates, Inc. completed a Level I Pre-Acquisition Environmental Site Assessment (ESA) on behalf of the NPS. The ESA revealed “Recognized Environmental Conditions,” including, but not limited to, stained soil in the engineering and maintenance area and a landfill at Honeymoon Beach and recommended further investigation. After these findings, the NPS worked to define the extent of the contamination, which included additional investigation. The results of this investigation were summarized by the NPS in an Engineering Evaluation/Cost Analysis (EE/CA) Report shared with the public in September 2021. Additional investigations were conducted in November 2021 and January 2022 to address several data gaps identified in the EE/CA report. This additional investigation confirmed the presence of asbestos containing materials at the site. The findings of the additional investigations are documented in a Draft Final EE/CA Addendum Report, made available for public review in September 2022. Additional information on the EE/CA and EE/CA Addendum can be found on the NPS Planning, Environment, and Public Comment (PEPC) website.¹ Future response actions to address contamination at the site would protect the workforce and public safety, and ongoing monitoring would be completed before the affected areas are opened to the public, and ongoing monitoring is recommended to determine whether any additional Comprehensive Environmental Response, Compensation and Liability Act response action may be necessary in the future. While the EE/CA and EE/CA Addendum are part of a separate process, the findings and conclusions of the EE/CA and EE/CA Addendum were taken into consideration in the development of this EA.

PURPOSE AND NEED FOR ACTION

The purpose of this EA 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.

This EA 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 VINP. This integration includes making the area accessible and welcoming to the local community, overnight lodging guests, and Park visitors² once the RUE expires in September 2023.

Objectives

Objectives are specific statements of purpose that provide an additional basis for comparing the effectiveness of alternatives to achieve the desired outcomes of the action (NPS 2015). The NPS identified the following objectives for this EA:

- Establish a national park experience through the presence of on-site NPS personnel to provide interpretation, education, and continued resource protection, while making available a space for cultural expression.

¹ Public Involvement for the Engineering Evaluation/Cost Analysis (EE/CA) Site Assessment at Caneel Bay Resort. National Park Service. Available Online: <https://parkplanning.nps.gov/projectHome.cfm?projectID=100132>.

² This EA refers to three types of users of the Caneel Bay area: local community or residents (users that live on St. John), guests (users that would be staying at the overnight lodging facility at Caneel Bay) and visitors (users that are visiting the Park from out of town but not staying at the overnight lodging facility at Caneel Bay).

- Offer welcoming and equitable opportunities that promote access, visitation, employment, and use of local businesses at the Caneel Bay area to a diverse range of users.
- Provide for economic opportunities in the Caneel Bay area through the establishment of commercial services.
- Ensure the redevelopment of the Caneel Bay area preserves and protects terrestrial, cultural, and marine resources, while blending with the landscape as envisioned by Laurance Rockefeller.
- Integrate the current RUE footprint into VINP to maximize operational efficiencies and ensure compliance with applicable laws, regulations, and policies.

IMPACT TOPICS RETAINED FOR DETAILED ANALYSIS

The impact topics described in this section are resources in the study area that may be affected either beneficially or adversely by the range of alternatives analyzed in this EA (described in Chapter 2). Impact topics that were considered but not carried forward for detailed analysis can be found in **Appendix B**. Topics were dismissed from further detailed analysis if it was determined that 1) the potential environmental impacts to resources or values would not be substantial; 2) the impacts were not central to the decision; or 3) if a detailed analysis of these impacts was not necessary to make a reasoned choice between alternatives.

Table 1 describes issues and the associated impact topics that were retained for detailed analysis because they met at least one of the above reasons.

Table 1. Issues and Impact Topics Retained for Detailed Analysis

Issue(s)	Impact Topic(s)
Many of the historic structures, sites, and landscape features in the Caneel Bay area sustained damage from the 2017 hurricanes as well as subsequent storm events and have not been stabilized or repaired, threatening the integrity of the historic district. The repair, rehabilitation, or removal (depending on condition) of the historic buildings, structures, and sites could adversely impact the historic district and its eligibility for listing on the NRHP.	Historic District
Based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map dated April 16, 2007 (Flood Map Number 78000000326), Scott Beach and Hawksnest Beach North areas are within the regulatory floodplain. Rehabilitating or reconstructing buildings, such as the overnight accommodations at Scott Beach or Hawksnest Beach North, would make the buildings safer, more accessible, and more resilient to future climate-related events. However, these buildings are within a regulatory floodplain and, as such, building rehabilitation or reconstruction likely would result in impacts to the floodplain.	Floodplains

Issue(s)	Impact Topic(s)
The Caneel Bay area was one of the primary economic drivers for St. John and the USVI. The Caneel Bay area provided economic benefits to the local community through increased visitation to the island, opportunities for employment at the site, and opportunities for local businesses that contribute to the operation of the site. There is a marked difference between the alternatives as well as considerable public interest in the socioeconomic outcomes of the Caneel Bay area.	Socioeconomics
Before the 2017 hurricanes, public access varied depending on the resort operator. Access to most areas within the RUE boundary was limited only to resort guests. Through civic engagement, the NPS heard that providing visitors equitable access to the Caneel Bay area that is inclusive of a diverse set of users, while still attaining the desired overnight lodging guest experience and day-use opportunities, should be a high priority.	Visitor Use and Experience

Impact topics not carried forward for detailed analysis and described in **Appendix B** include:

- Acoustic Resources and Soundscapes
- Air Quality
- Archeological Resources
- Coastal Zone Resources
 - Coastal Processes and Characteristics Including Beaches
 - Coral Reef and Seagrass Beds
 - Marine Wildlife Including Protected Species and Their Habitat
 - Essential Fish Habitat
 - Fish
 - Sea Turtles
 - Terrestrial Wildlife Including Protected Species and Their Habitats
 - Bats
 - Birds
 - Water Quality
- Environmental Justice
- Ethnographic Resources
- Human Health and Safety
- Vegetation
 - Terrestrial Vegetation Including Protected Species and Their Habitat
- Viewsheds and Dark Night Skies
- Wetlands

CHAPTER 2: ALTERNATIVES

This EA analyzes a no-action alternative and one action alternative (the proposed action/preferred alternative). Several alternatives or elements of alternatives, which were considered but not retained for additional evaluation, also are described at the end of this chapter. During development of the alternatives, the NPS took into consideration the public comments received during civic engagement opportunities held from January through March 2022, as well as comments received during the listening sessions in April 2021.

ALTERNATIVE A: NO-ACTION (NO REDEVELOPMENT)

Under Alternative A, or the no-action alternative, upon expiration of the RUE on September 30, 2023, the NPS would assume management responsibility of the Caneel Bay area and would not issue any permit, lease, or concession contract to reestablish overnight use or provide resort-style services. Any existing Commercial Use Authorizations (CUA) would be allowed to continue to operate at the Caneel Bay area until the expiration date noted on the existing permit. The NPS would minimally restore the site to allow for safe access by visitors through existing roads and trails, including safe access to beaches. The NPS would not provide visitor services, including overnight lodging at the Caneel Bay area beaches under the no-action alternative.

Alternative A proposes to designate the Caneel Bay area as a Conservation Zone (**Figure 3**). As further described in **Table 2**, the desired condition within the Conservation Zone would be that of a natural and undeveloped landscape. The NPS also would stabilize some historic buildings damaged by the 2017 hurricanes and subsequent deterioration to meet the NPS's responsibilities for historic preservation and visitor safety. The historic structures would be left in place, where possible, and their forms and outlines would be maintained. The buildings would remain vacant, and measures (e.g., fencing, boarding, etc.) would be put in place to prevent entry and trespassing. In addition, the NPS would conduct selective removal/demolition of buildings or portions of buildings that cannot be stabilized and present safety concerns. Any removal/demolition action associated with buildings or portions of buildings that are eligible for historic designation would be conducted in consultation with the USVI State Historic Preservation Office (VI SHPO). The NPS would identify appropriate management approaches (such as stabilization, rehabilitation, or removal) to address damages from the 2017 hurricanes and deferred maintenance when NPS can perform additional detailed condition assessments on the property.

During the selective stabilization or removal of structures, loose building materials that test positive for asbestos containing material would be removed from the site (i.e., properly bagged and disposed of off-island at a landfill certified to receive asbestos containing materials). Under Alternative A, the NPS would follow all federal and territory laws regarding site disturbance, erosion controls, legal disposal of waste, and tribal consultation, as well as other applicable laws.

Existing trails and viewing areas may be rehabilitated, and information on site hazards would be provided for public safety, education, and protection of the site. Existing roadways would be minimally

maintained and would primarily provide hiking access to viewing areas and beaches with limited parking.

The existing reverse osmosis water treatment facility would either cease operation or the NPS would continue its operations with a new commercial services agreement which would include additional environmental compliance as part of issuance of the agreement. If a new agreement is reached, the commercial water treatment facility could continue to produce and sell potable water. Similarly, the need to maintain and run the existing wastewater treatment facility would be assessed and then decommissioned, if appropriate.

The NPS and/or partner groups would continue to monitor natural and cultural resources in the Caneel Bay area, such as sea turtles, shorebirds, coral, historic structures, and archeological sites, to the extent resources are available and required by law. The NPS would identify appropriate management approaches (such as stabilization or restoration) to address damages from the 2017 hurricanes and post-hurricane actions, once recommendations are available from condition assessments.

Existing moorings would be used as is, and no new moorings would be added at the Caneel Bay area.

ALTERNATIVE B: PROPOSED ACTION/PREFERRED ALTERNATIVE (REDEVELOPMENT)

The NPS proposed action and the preferred alternative, Alternative B, aims to balance 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 landscape as envisioned by Laurance Rockefeller. Alternative B also identifies two potential locations for future community spaces where residents, overnight guests, and Park visitors could more directly experience the local culture of St. John and the USVI. Under Alternative B, the NPS and its partners would strategically work to resolve the damage to the Caneel Bay Historic District (or “historic district”) caused by the hurricanes while supporting its long-term preservation through adaptive reuse of the resort. Some of the actions within Alternative B would require changes to the mid-century resort to allow for redevelopment, address safety issues, provide for habitable spaces, and ensure resilience during future storm events, all while respecting the character and design intent of the historic district.

The NPS’s redevelopment and management approaches for the Caneel Bay area are presented in **Table 2**, which describes the management zones that correlate to the shaded areas in **Figure 4**. Management zones are designated areas that help with future planning and identify where specific desired conditions may be established and appropriate uses defined.

Future transportation system planning, such as the review of existing transportation infrastructure, site circulation including site drop-off and pick-up areas, and parking, would be conducted when full NPS site access 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 Alternative B. Future site-specific compliance and public involvement would 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 VINP that are not specific to the Caneel Bay area.

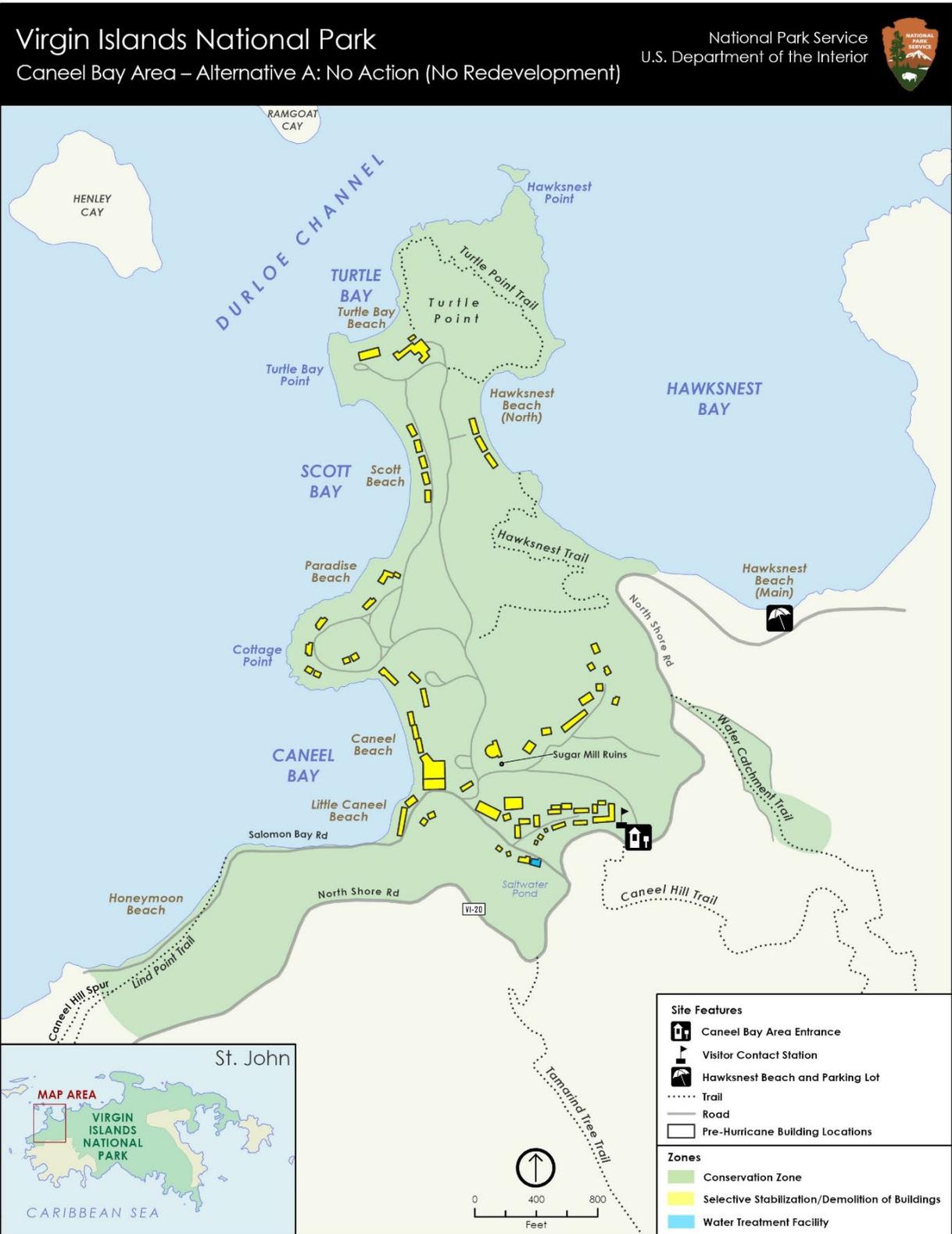


Figure 3. Alternative A: No Action (No Redevelopment)



Figure 4. Alternative B: Proposed Action/Preferred Alternative (Redevelopment)

Table 2. Management Zone Descriptions

Zone (Acreage)	Description (Desired Condition)	Facilities/Activities
Lodging Zone (67 acres)	Visitors would be provided an overnight experience commensurate with Laurance Rockefeller’s vision and site history for Caneel Bay. The overnight experience would be that of a twenty-first century eco-resort. In this zone, the overnight lodging and amenities would 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 this EA). This zone would be managed through a lease(s) and/or concession contract(s). This zone would include visitor amenities, such as dining and gift shops to support the overnight guests. The operator(s) would be responsible for sustainable operations. Areas with evidence of past disturbance, such as the tennis court area, would be a focus of new development because these areas suspected of having low natural and archeological resource potential.	<ul style="list-style-type: none"> • Overnight lodging and amenities would be provided such as lodging, dining, gift shops, beach access, employee housing, and associated infrastructure. • The redevelopment would 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 would occur, such as landscaping, mowing, and general upkeep of the ground, and include trash removal and cleaning of facilities. • Public access of day-use areas and facilities via roads and trails in this zone would be a condition of any lease(s) or concession contract(s) and coordinated with the larger Caneel Bay area redevelopment. • Utility corridors and pipelines would exist to support facilities.
Day-use Zone (5 acres)	Visitors, including residents of St. John, would be provided access to several beaches within the Caneel Bay area for recreation/day-use. In this zone, visitors would be provided amenities to enhance the visitor experience. Management by the NPS would be consistent with other public beaches at the Park, and concessions contracts would be used to provide visitor services.	<ul style="list-style-type: none"> • Public bathrooms/shower facilities. • Picnic areas/tables. • Food services by concessioner. • Equipment rentals (i.e., watersport rentals). • Swimming, snorkeling, and other water activities.
Conservation Zone (78 acres)	All Park visitors would 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 would be managed by the NPS. The desired condition in this zone is a natural and undeveloped landscape. The undeveloped nature of this zone would aid in the protection of areas with high archeological resource potential.	<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 would have an opportunity to have a national park experience by engaging with the NPS onsite, including through an NPS visitor contact station. Visitors would 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 would be managed and maintained by the NPS. All of the archeological sites previously determined eligible for the NRHP, including the plantation sugar factory complex, are located within this zone and would 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 would 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 would be visibly shielded from visitors, and access would be restricted to authorized personnel only. This zone contains historic buildings and landscape features that would be preserved and adaptively reused, as practicable.	<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 would 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.

Additional elements under Alternative B include the following:

Greater Public Access

Alternative B 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 would work with the developer(s) to seek appropriate access (such as parking, roads, and trails) to other beaches and other parts of the site. Access would continue to be permitted along shoreline areas specified in the USVI Open Shoreline Act and would be determined in consultation with the USVI Department of Planning and Natural Resources (VI DPNR).

Natural Resources Protection

The NPS and its partners would 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 would 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 identified in this EA, as well as the requirements of any commercial services contracts. The developer/operator would 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 would 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 would be outfitted with roof catchment and water treatment capabilities. Any new facilities or earth grading to convey water to treatment facilities would be designed to minimize impacts to existing resources. The addition of these practices would 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—would occur, as defined in Section 110 of the NHPA. The NPS would 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 would seek to preserve and/or rehabilitate historic properties and cultural resources within the APE and would seek to minimize or avoid further impacts that could occur because of redevelopment activities. NPS would 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. After the NPS can evaluate the recently completed initial condition assessments of historic properties and cultural resources, further assessment can be formulated, if necessary, and rehabilitation plans would be developed in consultation with the VI SHPO and potential future developers. Due to the phased access to the site and the phased redevelopment strategy, the NPS and the VI SHPO would enter into a PA to define the consultation and evaluation process for the treatment of historic properties within the APE in accordance with 36 CFR 800. A draft PA is provided as **Appendix A** for public comment.

Overnight Guest Experience Commensurate with the Site History

Under Alternative B, the NPS would work with one or more developer/operator to create an overnight visitor experience that represents 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. 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.

Future Community Space/Partnerships

Based on public comments received during civic engagement in April 2021 and January through March 2022, the NPS has identified two 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. The selection of two different 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 would 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 islands 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 craft, music, literature, visual arts, or cuisine.

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.

Future Commercial Opportunities

In future commercial use planning processes, a request for proposal (RFP) would seek ideas from developers following the objectives and prescribed conditions under Alternative B. The Caneel Bay area redevelopment would, 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).

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(s) 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 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.

Commercial operations at the site would be conducted in a manner consistent with the NPS vision for long-term sustainable operations outlined in the Green Parks Plan (NPS 2016b). From the Green Parks Plan from 2016, 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 is updating 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. 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>.

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. Visitor services, such as water sport rentals and food and beverage services, would be managed by the developer/operator or concessioner in areas designated by the NPS. Commercial operators would 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 would use the existing footprint of the past resort utilities to the extent possible. The NPS would encourage sustainable practices, such as the use of energy efficient systems and electric vehicles.

Commercial operations at the Caneel Bay area would be expected to contribute to the local economy of St. John by creating jobs and providing local business opportunities. As part of any commercial operation at the site, the NPS would 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 St. John; 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.

Suitability Analysis for Redevelopment

The extent of the damage to the existing buildings and the ability to reuse and reconstruct each building would be determined in future conditions assessments. Some buildings would need to be replaced, reconstructed, removed, or potentially relocated to a more resilient area or elevated above the floodplain. NPS would work with the developer to locate buildings in areas that avoid or minimize impacts to Park resources and reconstruct in a context-sensitive manner as described in the previous section. Appropriate permits and approvals for work in the floodplain and coastal zones would be obtained prior to implementation.

To fulfill the purpose to identify a sustainable and resilient redevelopment strategy for the Caneel Bay area, the NPS and developer would need to consider the many site characteristics. To help understand the site opportunities (i.e., flat land) and constraints (i.e., floodplain, cultural resources, steep grades), a suitability analysis was performed using Geographic Information System technology (**Figure 5**). This map shows the areas potentially suitable for development in the Caneel Bay area. The areas in red are the least suitable for new development. Areas range from low to high redevelopment suitability based on the following:

- Site topography – flat (high suitability) or steep (low suitability) areas
- Floodplain – the area within (low suitability) or outside (high suitability) the regulatory floodplain
- Future sea level rise and storm surge – areas less affected or unaffected (high suitability) or areas more affected (low suitability) by inundation resulting from sea level rise or storm surge
- Cultural and natural resources – within or near areas with high potential for known resources (low suitability) or away from known resources or in previously disturbed areas (high suitability)

From the review of the suitability map, there are four general areas most suitable for redevelopment: (1) the previously disturbed areas and higher ground on Turtle Bay Point, (2) the previously disturbed areas and higher ground at Cottage Point, (3) the previously disturbed areas of the contemporary tennis courts and adjacent areas near Garden Cottages, and (4) the existing maintenance facility. Potential effects on the historic district, viewsheds, lodging operations, and site circulation would be considered in the redevelopment strategy. Also, the area identified as the Conservation Zone, where no new development is a desired condition, was deemed to have a low suitability for redevelopment.

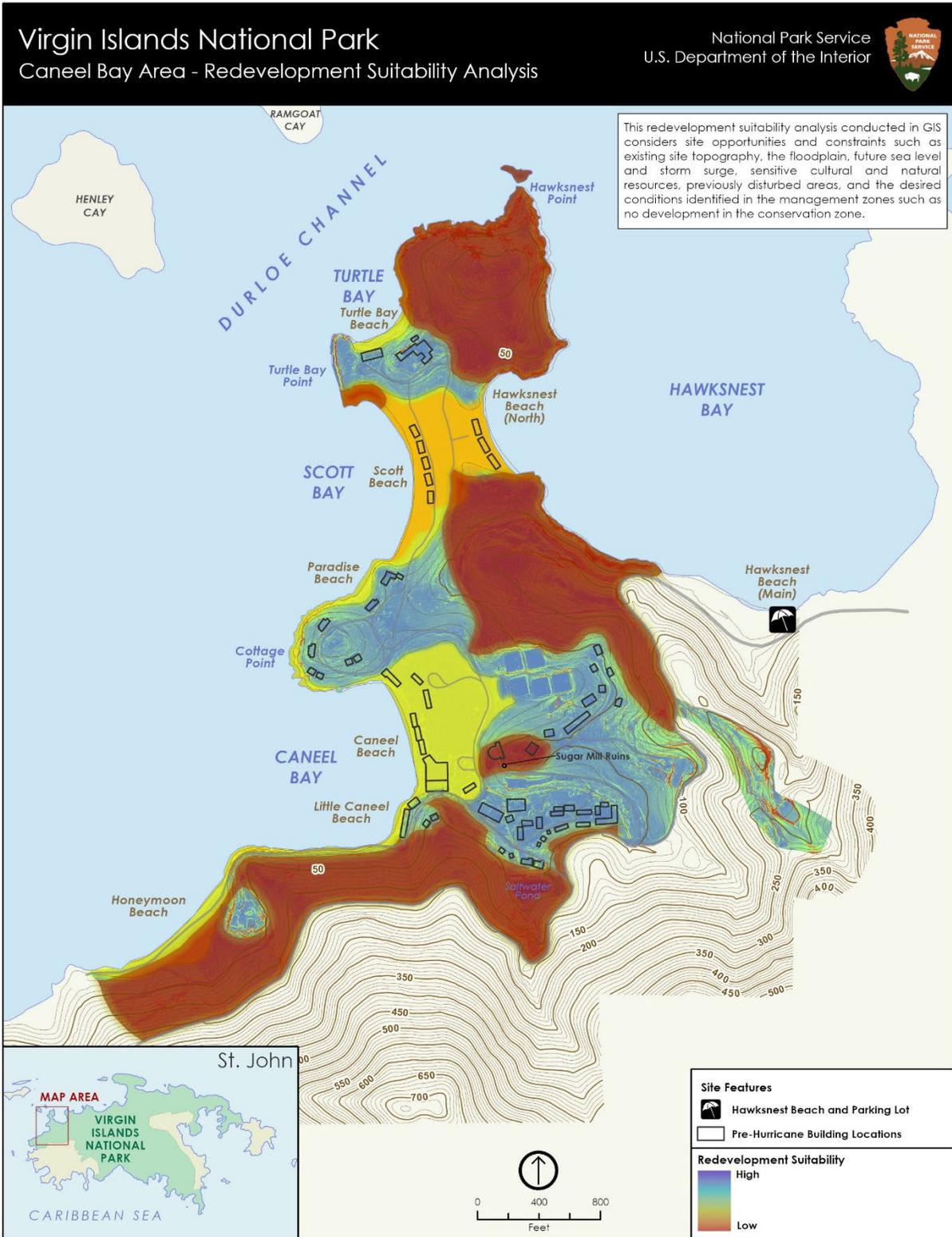


Figure 5. Redevelopment Suitability Analysis

MITIGATION MEASURES

The following mitigation measures and best management practices would be applied to avoid or minimize potential impacts from implementation of Alternative B.

Air Quality Protection

- The NPS would incorporate in future commercial service agreements a provision for green transportation to minimize impacts on air quality. The NPS would collaborate with the developer or operator to identify ways to minimize air emissions. Some ways to minimize air emissions include the use of electric vehicles and technologies in the developer or operator's fleet to increase efficiency and reduce greenhouse gas emissions to the extent practical and economically feasible. Another means is to limit parking at the site and encourage the use of taxis and other forms of transit.

Cultural Resource Protection

As outlined in the draft PA (**Appendix A**), the following measures would guide the implementation of Alternative B and avoid, minimize, and mitigate effects on historic properties. The NPS will continue to develop these measures in consultation with the VI SHPO, consulting parties, and the public. The terms of the final PA will reflect this consultation.

Archeological Resources

- NPS will 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 NPS's publication *The Archeological Survey: Methods and Uses* (1978: GPO stock #024-016-00091) and VI SHPO guidance.
- NPS will make a reasonable effort to avoid or minimize harm to archeological resources eligible for listing for the NRHP in the APE. 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 VI SHPO and any other appropriate parties.
- If needed, and if an adverse effect cannot be avoided, NPS will ensure that a data recovery plan is developed for each adversely affected site that is eligible for the NRHP in consultation with the VI SHPO. 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 standards and guidelines will consider the Advisory Council on Historic Preservation publication *Treatment of Archeological Properties* (1980) and developed in consideration of the VI SHPO guidance.

Historic Resources

- NPS will follow 36 CFR 800.4(b)(2) for the identification and evaluation to account for any previously unidentified historic properties (including archeological sites) and assess the integrity of above-ground historic properties since the historic district was determined eligible by NPS for the NRHP in 2012.

- NPS will follow 36 CFR 800.4(c) to evaluate the historic significance and determine if previously identified historic structures still retain integrity following the 2017 hurricanes. Ongoing consultation will occur with the VI SHPO and other interested parties to come to a determination of eligibility for structures within the APE.
- The NPS will retain a qualified Architecture/Engineer team to prepare a condition assessment of historic buildings and structures that are considered NRHP-eligible or contributing to the 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 the adaptive reuse of existing facilities and aid in the consultation effort with the VI SHPO, affected parties, and the public.
- 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 VI SHPO, 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 through mitigation (36 CFR 800.6(a)).

Mitigation

Potential mitigation measures that will be developed through ongoing consultation with VI SHPO, consulting parties, and the public may include, but are not limited to:

Documentation

- Develop an updated NRHP Nomination Form for the historic district and pursue nomination to the NRHP for the historic district.
- Conduct a Cultural Landscape Inventory (CLI) of the historic district to inform an updated NRHP nomination.
- Conduct NRHP Determinations of Eligibility for archeological sites or unidentified historic assets not specifically addressed in the *Caneel Bay Historic District Determination of Eligibility*.
- Develop an inventory and GIS data set for Heritage Trees that qualify for protection, in consultation with a qualified local arborist.
- Prepare Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey (HABS/HAER/HALS) documentation of the affected resource in event of an Adverse Effect to a contributing element to the historic district or other historic property.

Design Guidelines

- Develop design guidelines to be used during the redevelopment process that would guide the preservation and rehabilitation of the existing historic resources, development of new buildings, and design of new landscape features within the historic district to reflect the significance of the property.
- Address landscape components and the spatial relationships of the resources in the design guidelines. The process of determining any building height restrictions would be specified in the design guidelines and consider views, topography, and vegetation.

Resource Protection

- Conduct archeological monitoring of all ground-disturbing activity in areas with potential archeological resources as described in the draft PA, including monitoring of historic masonry repair and reconstruction, and the actions associated with the removal of vegetation from structures and in areas of archeological sensitivity.
- Protect all Heritage Trees within the zone of construction activities from construction-related impacts using established practices recommended by the International Society of Arborists.
- Undertake periodic condition monitoring to ensure the long-term stability of Heritage Trees.

Treatment Measures

- Develop a Historic Structures Report to guide the treatment of historic buildings, structures, and objects in the zones of NPS management responsibility that are consistent with The Secretary of the Interior's Standards of Treatment of Historic Properties.
- Develop a Cultural Landscape Report with Treatment Guidelines for all areas of NPS management responsibility to guide the treatment of the cultural landscape and new additions to the district. Guidelines will be consistent with The Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.

Interpretation

- Develop interpretive displays or markers to provide information on the history of various significant resources, including archeological resources and historic resources.

Coastal Zone Resource Protection

- Best management practices (BMPs), such as turbidity curtains and silt fences, would be implemented during construction activities to minimize runoff into water bodies to the extent possible. Erosion and sedimentation BMPs would be inspected and maintained on a regular basis to ensure they are functioning properly.
- Prior to construction, species-specific surveys would be conducted, as needed and in consultation with the United States Fish and Wildlife Service (USFWS).
- Construction and maintenance activities would be limited to daylight hours to minimize disturbance to sea turtles.
- A lighting plan would be prepared to include the use of sea turtle safe lighting.
- All on-site project personnel associated with the project would be trained in the identification of sea turtles and sea turtle nesting activity.
- During construction, in the event a sea turtle or sea turtle nest is discovered, work would immediately stop and the NPS would be contacted and coordination with resource agencies would be conducted, as appropriate.
- During construction, sea turtle monitoring would be conducted through the VINP Sea Turtle Monitoring and Protection Program.

Dark Night Skies and Viewshed Protection

- Any new development would be required to use downward facing lighting. Development would mostly be limited to the existing disturbed footprint, and structures would only be elevated when necessary for storm surge and flood resiliency.
- Redevelopment lighting would follow sea turtle safe lighting guidelines.
- Any new materials for redevelopment would be sourced to be aesthetically consistent with the surrounding environment.

Floodplain Protection

- Redevelopment activities would incorporate methods for minimizing storm damage in compliance with the National Flood Insurance Program's Floodplain Management Criteria for Flood Prone Areas (44 CFR 60.3) for flood prone areas.
- Future redevelopment would be consistent with the goals and policies of the VI Coastal Zone Management Program, and new development would occur primarily outside of the existing floodplains.
- The NPS would elevate non-historic structures when necessary for storm surge and flooding resiliency.

Health and Safety

- During the redevelopment, the presence of asbestos would be taken into consideration and addressed during the proposed rehabilitation, replacement and/or demolition of buildings, utilities, or other structures. Loose building materials that test positive for asbestos containing material would be removed from site (properly bagged and disposed of off-island at a landfill certified to receive asbestos containing materials). The NPS would follow all federal and territory laws regarding site disturbance, erosion controls, legal disposal of waste, tribal consultation, and other applicable laws.
- Redevelopment would be designed to be sustainable, resilient, and energy efficient, as well as to meet accessibility requirements.
- The site developers or operators would be required to comply with applicable environmental laws and the NPS requirements, which would be written into or incorporated by reference into a lease or concessions contract. For instance, the NPS would comply with EO 13693: *Planning for Federal Sustainability in the Next Decade* for the redevelopment of the Caneel Bay area.

Soundscape Protection

- Construction and maintenance activities would be limited to specific times and locations to minimize impacts on visitors and ecologically sensitive areas.
- Noisy tools, such as chainsaws and chippers, would be operated in a manner that minimizes impacts on the soundscapes. Sound proofing of generators or other utilities would also be considered.

Vegetation Protection

- When the redevelopment design is completed, natural resource surveys would be conducted prior to any clearing and removal of vegetation. The NPS would seek to minimize impacts to vegetation through context sensitive site design and using the previously disturbed footprints of existing facilities.
- Redevelopment would consider the site topography and utilize to the extent practicable areas with low topographic relief and previously disturbed areas to avoid excessive erosion and damage to resources.
- Species surveys for any federally listed species under the Endangered Species Act would be conducted prior to any vegetation removal.
- In coordination with the NPS, any fill, mulch, reseeded, and sod material brought into the Park must be free of non-native, invasive plants and animals, and noxious weeds.
- As part of the natural resource surveys, the NPS would survey and provide protection for heritage trees as appropriate in compliance with the USVI Heritage Tree Law.

ALTERNATIVE ELEMENTS CONSIDERED BUT DISMISSED FROM DETAILED ANALYSIS

During early planning efforts for the EA, the NPS took into consideration public comments received during the April 2021 public listening sessions and the input of an NPS multi-disciplinary study team to develop a conceptual range of preliminary alternatives. As part of the civic engagement conducted for this EA in January through March 2022, preliminary alternatives were shared via newsletter and public presentations with the goal of obtaining additional public input. Based on comments received, certain alternative elements were added or removed in the development of Alternative B. As an example, potential locations for a future community space, considering the site topography and site circulation, were added as a part of Alternative B. Conversely, a preliminarily proposed new roadway from North Shore Road to Hawksnest Beach North was removed based on concerns regarding resource impacts. A summary of and rationale for these and other alternatives or options considered but not retained for further detailed analysis follows.

During civic engagement, the public presented a range of alternate uses for the site including, but not limited to, a golf course, wellness site, hospital or clinic, retirement facility, open-air market/farmers market location, agricultural use of the site, botanical garden, employee housing, special events location/festival site, small museum, or dinghy docks. Commenters also expressed a desire to return the site to its former luxury resort status or provided recommendations on the location and size of the Lodging Zone presented during the public meetings (then called "Resort Zone"). The NPS considered these options; however, many of these options were not carried forward because they did not meet the purpose, need, and objectives of this plan, were not consistent with the NPS management policies or had unacceptable environmental impacts. In some cases, the alternate uses were too detailed at this stage of planning the redevelopment. The proposed action/preferred alternative in this 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.

Retention of Boundaries of RUE for Resort Operations/Management with Increased Day-Use Access

This alternative, as presented during the January through March 2022 civic engagement, would use the entire 150-acre area of the historical RUE for resort redevelopment operations and management. The NPS would provide oversight and management through the terms and conditions of a commercial services contract, but there would be no NPS presence at the site. Day-use access and services would be provided solely by the operator, except at Honeymoon Beach, which was identified as a public day-use recreation area to be managed by the NPS. The operator would be responsible for site maintenance of areas known to include significant cultural resources. This alternative would not meet the purpose to provide a range of overnight and day-use options since management would be at the discretion of the operator as it was in the past. This alternative would not integrate the value and history of the community of St. John or provide a range of visitor experiences, such as expanded day-use opportunities. This alternative also does not fulfill the NPS objectives to provide a strong NPS presence on site to give visitors a sense they are at a national park, and to ensure that the significant resources within the Caneel Bay area are managed in such a manner that is consistent with the NPS mission.

Continuation of Existing Resort Operations/Management

This alternative, as presented during the January through March 2022 civic engagement, would use the entire 150-acre area of the historical RUE for resort redevelopment, operations, and management. A “Resort Zone” would be the only management zone. The cost and responsibility for redevelopment would be primarily on the developer/operator selected through a competitive commercial services process. The NPS would provide oversight and management through the commercial services contract, but NPS presence on site would be limited. This alternative does not meet the purpose to provide a range of overnight and day-use options or the need to enhance access to the public. This alternative also does not fulfill the NPS objectives to provide a strong presence on site to give the visitors a sense they are at a national park, and to ensure that the significant resources within the Caneel Bay area are managed in such a manner that is consistent with the NPS mission.

New Roadway from North Shore Road to Hawksnest Beach North

The NPS considered a new road connecting North Shore Road to the Hawksnest Beach North area to provide opportunities for multiple operators for overnight accommodations. To construct this new road, the NPS considered utilizing an existing historical roadbed. The objective of this road was to provide direct access to the Hawksnest Beach Cottages to avoid conflict among lodging operators. Based on public comment and further investigation, the NPS dismissed this new road after weighing potential environmental impacts against the number of visitors the road would benefit. Furthermore, the portion of the Caneel Bay area where the new road was proposed could be alternatively accessed using the existing roads system with coordination from future developers/operators.

Shared NPS/Operator Maintenance Facility and Transportation Hub

The NPS considered relocating its primary maintenance facility and creating a shared maintenance facility for the Park and resort operator using the past resort maintenance yard and converting the existing VINP maintenance facility in Cruz Bay to a transportation hub. The objective would be to increase operational efficiencies by having a more centralized location within VINP.

The replacement of the maintenance facility at VINP has been a long-term need for the Park. Preliminary planning and design have already progressed for a new maintenance facility at the existing site at Cruz Bay. A joint facility at the Caneel Bay area presents certain challenges related to cost and space sharing with any future operator. There also are unknown factors regarding the condition of the facilities at the Caneel Bay area until full NPS access is obtained; thus, the cost and the ability to reuse the existing maintenance yard also is unknown. In addition, the existing maintenance facility in Cruz Bay is better suited to accommodate the NPS need for a boat service bay with an overhead crane. This location is closer to the boat ramp and where the NPS vessels are docked. The NPS likely would have needed a separate site for maintenance of its large vessels given the transportation challenges of the steep, curvy North Shore Road to the Caneel Bay area. For these reasons, a joint maintenance facility at the Caneel Bay area would be technically and economically infeasible at this time and was dismissed. The NPS would still consider ways to use and operate a smaller portion of the maintenance yard at the Caneel Bay area for operational efficiencies, but at a much smaller scale.

CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter describes both the affected environment (the existing conditions of resources, including trends and planned actions) and environmental consequences (impacts) of Alternatives A and B on each resource.

Methods and Assumptions

The following analysis evaluates direct, indirect, and cumulative impacts that would result from the implementation of the action alternative as well as the no action alternative. A factual description of the direct and indirect impacts provides the reader with an understanding of how the current condition of a resource would likely change as a result of implementing the alternatives. The approach includes the following elements:

- The analysis is focused, to the greatest extent possible, on management changes and associated issues that could have meaningful impacts on the resources being evaluated.
- The description of the affected environment and analysis of impacts follow the CEQ NEPA regulations, as amended in May of 2022, the Department of the Interior NEPA regulations, and the 2015 NPS NEPA Handbook (NPS 2015).
- *Analysis Area.* The analysis area for the EA includes the roughly 150 acres subject to the RUE and surrounding areas, as shown previously in **Figure 2**. This boundary is also the APE for the purposes of the assessment of effects to cultural resources and consultation requirements under Section 106 of the NHPA.

General Methodology

This section is organized by impact topic (also referred to as resource). The current and expected future condition of the environment is presented first and includes a discussion of trends and past, present, and reasonably foreseeable future actions that affect each resource. The environmental consequences section evaluates direct and indirect impacts from the implementation of each alternative. A factual description of the direct and indirect impacts provides the reader with an understanding of how the current and expected future condition of the resource would likely change as a result of implementing the alternatives. A comparative conclusion of the alternatives is included for each impact topic.

This EA also considers cumulative impacts, namely “the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.1). Cumulative impacts have been addressed in this EA by resource and are considered for the no-action alternative and the proposed action. Some of these actions (which includes projects) are in the

early planning stages; therefore, the evaluation of the cumulative impacts is based on a general description of the projects. The cumulative impact analysis under each resource describes the impact of those ongoing and planned actions, plus the incremental impacts of the two alternatives (no action and action). Impacts of past projects are discussed in the affected environment section as part of the resource trends and considered as part of the existing conditions. Projects that represent the present and reasonably foreseeable planned actions are also described in the trend analysis.

Climate Change

A key consideration in current planning efforts for infrastructure and Park management is climate change. The effects of rising water and air temperatures, changing precipitation patterns, increasing storm frequency and intensity, rising sea level, and other climatic changes are evident in the national park system. The NPS recognizes the importance of addressing the effects of current and future climate change in its planning and, as such, this EA considers the effects of climate change in its analysis. One of the NPS objectives for redevelopment is to design the facilities to be resilient to more severe storms and sea level rise.

Because island ecosystems are particularly sensitive to changes in climate patterns (NPS 2016a). During the past 100 years, the average annual air temperature in the Caribbean has increased by more than one degree Fahrenheit. Relative sea level is rising about 3.9 inches per 100 years at sites being monitored throughout the Caribbean and Gulf of Mexico (NPS 2016a).

Climate change could have a range of effects on the USVI. Although difficult to conclude, scientific models suggest that changing climate could lead to higher wind speeds and more frequent storms for the Caribbean such as hurricanes and tropical storms; increased erosion and/or accretion across the coastline; rising groundwater tables and possible saltwater intrusion; and loss of land and habitat important to wildlife, including sea turtle nesting beaches. Increases in seawater temperatures could lead to coral bleaching and mortality from coral diseases. Rising ocean acidity levels also can cause widespread loss of coral reefs; ocean acidity has increased by about 25% in the past three centuries, and it is likely to increase another 40 to 50% by 2100 (USEPA 2016). Coral reefs provide critical habitat for a diverse range of species, and healthy reefs and fish populations support fisheries and tourism (USEPA 2016).

Climate change jeopardizes the natural and cultural resources of the USVI by degrading the environment with increasingly severe and possibly more frequent storms and droughts, rising sea temperatures, and inundation of the coastline, all of which have the potential to affect quality of life on St. John (NPS 2016a).

The NPS performed a suitability analysis for the Caneel Bay redevelopment, which includes examining sea level rise and storm surge using the NPS sea level rise tool. The trend analyses in this chapter describe how climate change would affect resources in the future, when applicable.

HISTORIC DISTRICT

Current and Expected Future Conditions of the Environment

The historic district, eligible under NRHP Criteria A, B, and D, is entirely contained within the study area (Wild 2022a; Wild 2022b; Jaeger and Labrie 2012). The historic district contains 109 contributing resources, including 71 buildings, 24 sites, 13 structures, and one object. Nineteen resources are considered non-contributing. A “contributing” resource is a resource within a historic district that embodies the significant historic physical characteristics and features.

NRHP Criteria for Evaluation

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Archeological survey data demonstrate the high site probably throughout the undisturbed portions of the historic district. There are 11 archeological sites/ruins that are contributing elements to the historic district with ten of the features associated with the Caneel Bay Plantation Complex and the Caneel Bay Enslave Village (post emancipation village). These 11 sites are located within the Interpretative/Engagement Zone to be actively managed by the NPS. Other known sites but not contributing to the historic district include at least two precontact archeological sites (“precontact” encompasses human activities, events, and occupations before written records). These sites include the Durlow Bay Prehistoric Sites and Scott Beach Prehistoric Site. These sites require additional testing to determine their eligibility for the NRHP.

Historic sites include those related to Peter Durlow’s Estate/Old Estate Klein Caneel sugar plantation (e.g., a circa [c.] 1780 animal mill and nineteenth century ruins of the servants’ quarters, the factory, the overseer’s house and kitchen, the cisterns, the water mill tower, a warehouse, and an animal pen); the remains of a village inhabited by people who were enslaved at the plantation; and the overall landscape associated with the twentieth century Caneel Bay Resort (Jaeger and Labrie 2012; Ausherman 1982). Caneel Bay also played a central role in the 1733 Insurrection of the Enslaved Community that swept the island. The well-situated and defensible core of the Durlow Plantation within and near the project area was a refuge for the settlers, withstood a siege, and was the launching point for an international effort to suppress the rebellion. Portions of the historic district, therefore, played a key role in the drama of rebellion. The historic colonial-era plantation sites, especially those ruins within the study area associated with the 1733 insurrection and its suppression, are imbued with special meaning as recognized by the annual pilgrimages by St. Johnians and descendant Maroon communities (Jaeger and

Labrie 2012; Wild 2021. 2022a-b). The contributing precontact sites likely represent large Classic Taino period villages that have significant associations with other more thoroughly studied archeological sites on St. John (Jaeger and Labrie 2012; Wild n.d.). Earlier sites associated with the pre-ceramic archaic period have also been observed, including a site that has experienced erosion along the shores of Scott Beach. Furthermore, significant ethnographic resources, traditional cultural properties, and historical landscapes exist within the APE. Several of the historic structures within the historic district have also been recorded for the HABS, documented with photographs, photo captions, and information on a survey form, dating from several different times, including 1960, 1969, and 1983.

The other contributing properties within the historic district relate to the mid-century development of the Caneel Bay Resort as an architect-designed eco-resort that encompassed buildings, structures, objects, and landscapes. These include the Main Building (1940, 1969, 1982), Dive Shop (1963), the Beach Rooms (1969), Cottage Point Rooms (1963), Paradise Beach Rooms (1963), Cottage 7 (1962), Scott Beach Rooms (1960), Turtle Bay Estate House and Turtle Bay Estate Servants Quarters (c. 1950-52), Turtle Bay Estate House Rooms (1950-52, 1961), Hawksnest Beach Rooms (1967), Tennis Shop and Massage Center (1953, 1966, 1985-87), Gift Shop (1956-1960) and the adaptively reused restaurant in the historic structure remains of the animal mill (1964, 1989). These are joined by the Managers Cottage (1961), Courtside Rooms (1963, 1985), and Garden View Rooms (1963, 1985).

The Maintenance Yard, which includes all the buildings and structures that supported the resort's functions and at one time served as employee housing, consists of 23 buildings, structures, and objects constructed of concrete, concrete block, and metal panels from the 1950s to 1968. Other functional structures include the Caneel Bay Pier/Main Dock (1953), Staff Parking and Guest Parking/Taxi Area (1961), Welcome Center and Gate (1963), and a two-million-gallon cistern (1956). These are integrated with objects including the Water Catchment Basin (1956) and an Earth Dam (c. 1955).

The Caneel Bay landscape is considered a contributing element to the historic district. This designed historical landscape is the setting for the before-mentioned contributing buildings as well as contributing hardscape elements, including roads, pathways, historical tennis courts, bus shelters, two historical wells, parged drainage swales, light standards, and manicured lawns. Modern intrusions into the landscape include the basketball hoop, croquet lawn, and telephone booths, all among the 19 non-contributing elements dating from the 1980s to 2001.

Furthermore, the Caneel Bay Cultural Landscape remains intact based on field survey work completed by NPS Historic Landscape Architect David Hasty in November 2022. The cultural landscape is represented in CRIS-CL record no. 976254 "Caneel Bay Cultural Landscape" and was acknowledged in the 2017 Determination of Eligibility documentation. The 14 cultural landscape characteristics would be part of the guidance for rehabilitation projects within the historic district and would be equally as influential as historic structure treatment guidance. Recognition of cultural landscape values, potential to impact the cultural landscape from redevelopment or no redevelopment, and the need to mitigate potential impacts would be addressed along with the historic district following the actions noted in the draft PA presented in **Appendix A**.

Heritage trees and other types of trees within the Caneel Bay area are recognized by the Park and the territory as having cultural value. For example, Tamarind trees dot the landscape of USVI, and the large size of some of these trees indicates that they may date to the nineteenth century or earlier. In the Caneel Bay area, several trees were described in Nicholls' 2006 book, *Remarkable Big Trees in the U.S. Virgin Islands*: West Indian locusts, white cedar, genip/kenip, rose trumpet, rain tree, and hazel sterculia. The trees contribute aesthetically and culturally to the former resort's landscape. Of the White Cedar, Nicholls states, "[i]n one area, seven of these trees are spread across a large common bordered by guest houses" (Nicholls 2006). Heritage trees on publicly owned lands are protected under Bill No. 32-0062, *The Community and Heritage Tree Law of the Virgin Islands*.

Following the 2017 hurricanes, the NPS understands that limited efforts have been taken by the RUE holder to repair and use existing buildings, and most structures have not been stabilized to save the property from further damage. The NPS assumes that majority of the buildings have been unoccupied, except for a few buildings such as ZoZo's at Caneel Bay Restaurant, which reopened in the winter of 2021. Unrepaired structures and buildings have likely fallen into even further disrepair potentially affecting the historic integrity of the historic district and, potentially, the original fabric of each individual structure. Evidence from remote surveys (aerial and boat observations) and a more recent survey in November 2022 show heavy vegetation overgrowth in and around structures and unstable masonry with significant cracks and failings in rock rubble and stucco facades, chimneys, and walls. Structural integrity is questionable and must be assessed when full site access is allowed. Without active intervention, degradation of the resources would continue, increasing in consequence, and the historic resources would be irreparably lost.

From a trend perspective, natural and environmental forces of the Caribbean pose a severe threat to the USVI's cultural resources (VI SHPO 2016). There are many areas of significant cultural resources that are in low lying areas near the coastline that are impacted by overland floodings, beach and shoreline erosion, and storm surge. There are such instances of shoreline erosion impacts in the Caneel Bay area near Turtle Point. Sea level rise and future shifts in weather patterns further contribute to coastal erosion and have the potential to impact some historic structures that contribute to the historic district at the Caneel Bay area.

Reasonably foreseeable planned actions that could affect historic resources within the Caneel Bay area and the Park at large include future utility and roadway projects, such as the USVI Government Water and Power Authority (WAPA) Utility Project and Salomon Bay Road Reconstruction, also known as the Lyne House Access Road Reconstruction. Both projects are in or adjacent to the APE and could result in changes to the landscape such as new road construction or vegetation clearing for the new utility. Past and ongoing projects, such as the recent storm recovery project replacing the Lind Point Housing and Administration Buildings, have adversely impacted historic resources due to alteration of buildings or changes to the landscape that could be visible to some visitors accessing Honeymoon Beach. The NPS regularly consults with the VI SHPO on actions that could impact the historic district and historic resources of VINP.

Environmental Consequences

Methodology. This analysis was prepared using the best information currently available from surveys and inventories conducted within the Caneel Bay area prior to the 2017 hurricane season, most notably the 2012 NRHP Registration Form for the historic district. Other information and data considered in the analysis included post-hurricane observations conducted by boat and reviews of aerial imagery. In addition, the NPS conducted initial condition surveys of archeological sites and ruins in November 2022, and the results of these surveys would inform future management decisions.

This data limitation is due to limited access to conduct condition assessments to support this NEPA analysis. The full extent of the damage that the historic district experienced during the 2017 hurricane season, as well as that which may have occurred since then due to deferred maintenance, is largely unknown. The NPS would continue consultation with the VI SHPO and identify next steps and appropriate investigation to determine whether historic resources retain sufficient integrity to continue to be considered eligible for listing on the NRHP or contributing to the NRHP-eligible historic district.

Alternative A: No-Action (No Redevelopment). Alternative A proposes to designate the Caneel Bay area as a Conservation Zone. The NPS would minimally stabilize some historic buildings affected by the hurricane damage and subsequent deterioration to meet the NPS's responsibilities for historic preservation and visitor safety. The historic structures would be left in place, where possible, and their forms and outlines would be maintained. Additional condition surveys are needed to determine the state of each existing building and structure that contributes to the historic district; however, adverse impacts would be expected based on the management approach to stabilize buildings/structures in place, leave vacant, and/or selectively demolish some structures for safety purposes. Salvageable buildings would remain unoccupied and public access restricted for safety purposes. Public access to structures that are potentially unsafe would be secured from unwanted entry by boarding entryways, installing fences, or adding signs informing visitors of the safety risks.

Some buildings could be removed from the site for human health and safety reasons. Demolition and removal of buildings or structures would include implementation of mitigation measures as described in Chapter 2 to address potential risk associated with asbestos. The asbestos was identified in buildings during the EE/CA Addendum investigation conducted under the Comprehensive Environmental Response, Compensation and Liability Act. The presence of asbestos in combination with the existing building condition would be another consideration in the NPS decision on removal or selective demolition. Additionally, future storm events and sea level rise could continue to impact the integrity of some buildings within the historic district if not fully stabilized or regularly maintained.

With sufficient effort given to stabilization and ongoing maintenance, surviving historic properties could maintain their integrity of location, design, materials, and workmanship to the extent that those aspects of integrity currently remain. As a preservation measure, the NPS would follow the guidance provided in NPS Preservation Briefs for Mothballing Historic Buildings (NPS 2001). The NPS would prepare condition assessments, conduct minimal stabilization, and mothball the building or structure. Mothballing refers to a process of securing the building, providing adequate ventilation, modifying utilities or mechanical systems, and implement a maintenance and monitoring plan for protection. The removal of buildings or structures and measures to restrict access such as boarding, fencing and signage for safety purposes would have an adverse impact to the historic district.

In addition, Alternative A would have an adverse impact to the historic district because of the loss of design, materials, feeling, and association related to not redeveloping the site and maintaining the grounds to its historical use as an eco-resort. The historical landscape and its setting, feeling, design, and association with Laurance Rockefeller's eco-resort concept would be altered by returning the area to a more natural setting.

In summary, Alternative A would result in an adverse impact to the historic district because of the loss of integrity of the landscape and contributing built resources that would need to be selectively demolished and the change in the setting, feeling, design, and association with the original 1950s-era eco-resort concept.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions are described in the "Current and Expected Future Condition of the Environment" section. For instance, planned future actions such as the Salomon Bay Road Reconstruction and WAPA utility project could have changes to the historic landscape from vegetation clearing and construction of a new road or utilities. The impacts from these projects would be expected to be small in relation to historic district resources at the Park. Alternative A, as described in the impact analysis, would result in a noticeable incremental impact to the historic district because of changes to the design landscape, loss of contributing resources, and loss of feeling and association from not returning the site to its historical use. The overall cumulative impact of Alternative A, when added to present and reasonably foreseeable planned actions, would be adverse to historic districts but small in scale in context of the Park.

Alternative B: Proposed Action, Preferred Alternative (Redevelopment). Alternative B would reopen the area for overnight lodging and as a recreational area with enhanced historic resource interpretation opportunities and maintenance. Impacts to historic resources would vary depending on the management approach and desired conditions outlined in each management zone.

Across all zones, inspections of existing structures would be required to determine to what degree existing facilities would be available for reuse. 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. In this case, adverse impacts would occur to contributing resources of the historic district from removal of buildings that cannot be rehabilitated or repurposed. The management zones identified in this EA (**Table 2**) were purposely designed to avoid and minimize effects on 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 where no new development would occur.

Through consultation with the VI SHPO and using mitigation and minimization measures proposed in Chapter 2, the removal of these buildings could have an adverse impact to contributing resources to the historic district but would not impact the historic district to a degree that would make it ineligible for the NRHP. Additionally, changes to the historic landscape could occur depending on design plans developed by an operator in coordination with the NPS and the VI SHPO. Compared to the current condition of the site, the Alternative B is anticipated to restore the feeling and association related to the

site's historical use as an eco-resort. Alternative B would support the long-term preservation of the historic district through adaptive reuse of some buildings and rehabilitating some elements of the historic landscape, which is a contributing feature to the historic district. Overall, the NPS would strategically work to resolve the adverse effects to the historic district caused by the 2017 hurricanes while supporting its long-term preservation through adaptive reuse. As a result, Alternative B would have a beneficial impact on the historic district through rehabilitation and preservation in accordance with US Department of Interior standards as well as long-term management of the resources and restoring the site to its historical use as an eco-resort.

This undertaking would be subject to the PA (see draft PA in **Appendix A**) outlining the 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. Mitigation measures for cultural resource protection are described in Chapter 2 and additional information can be found in the draft PA provided in **Appendix A**.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions, as described in Chapter 3, are adverse. Planned actions such as the Salomon Bay Road Reconstruction and WAPA utility project could have changes to the historic landscape from vegetation clearing and construction of a new road or utilities. Alternative B would have adverse impacts to some contributing features of the historic district from the removal of buildings and changes to the designed historic landscape. However, overall, the NPS would restore the historic district and provide beneficial impacts as described in the impact analysis. With this understanding, the overall incremental impacts of Alternative B would be beneficial. The overall cumulative impact, when added to present and reasonably foreseeable planned action, would be beneficial to historic resources as the NPS would continue ongoing consultation with the VI SHPO and adhere to the conditions outlined in the PA.

Alternative B offers different levels of development activities and protection of Park resources, including the historic district. In some instances, Alternative B would benefit many of the contributing resources to the historic district through preservation, maintenance, and upkeep, as well as reestablishing the site's feeling and association with its historic use to include overnight lodging and visitor amenities. Conversely, the addition of new structures and elements associated with the redevelopment to replace damaged facilities or removed structures from the floodplain could result in an adverse impact to the historic district. The management zones identified in this EA (**Table 2**) were purposely designed to avoid and minimize effects on archeological sites and to ensure NRHP-eligible sites would be kept under the NPS management control. High potential areas are protected in the Conservation Zone where no new development would occur. Under Alternative B, the NPS would strategically work to resolve the adverse effects to the historic district caused by the storms while supporting its long-term preservation through adaptive reuse. Some actions may require changes to the mid-century resort to allow redevelopment, address safety issues, provide for habitable spaces, and ensure resilience during future storm events, while maintaining the character of the historic district.

Conclusion. Overall, Alternative B would have a net beneficial impact on the historic district as the NPS would stabilize, rehabilitate, preserve and/or adaptively reuse, where possible, existing structures, according to the Secretary of the Interior's standards. 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 could maintain their integrity of location, design, materials, and workmanship to the extent that those aspects of integrity currently remain. The actions under Alternative B are not expected to change the NRHP eligibility for the historic district, and in the context of the cultural resources at VINP, the impacts would be noticeable but small in scale. The actions under Alternative B would be intended to allow the redevelopment described in Alternative B in a manner consistent with its original design values so as to allow the sum of the contributing elements to convey the significance of the historic district.

When compared to Alternative A, Alternative B would better support the NPS's responsibility for the long-term management of the cultural resources in the Caneel Bay area. Alternative B would seek to stabilize, rehabilitate, preserve, and/or adaptively reuse the existing structures according to the Secretary of Interior's standards, whereas Alternative A would be more limited in the scope of resource protection (e.g., stabilization). Under Alternative A, there would be a loss of feeling and association related to not redeveloping the site and maintaining the grounds in accordance with its historical use as an eco-resort.

FLOODPLAINS

Current and Expected Future Conditions of the Environment

Floodplains are defined by *Procedural Manual #77-2: National Park Service Floodplain Management* as "the lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands and (at a minimum) that are subject to temporary inundation by a regulatory flood." Approximately 19 acres of regulatory floodplains exist within the study area. Currently, structures/buildings cover less than one acre (approximately 4%) of the floodplain within that area. The vast majority of these structures are associated with the Scott Beach and Hawksnest Beach North cottages.

In the past, the Scott Beach and Hawksnest Beach North Cottages have been an impediment to the flow of water and subject to flooding based on their building design below the flood elevation. Floodplain values include the ability of the floodplain to absorb increased water flows, recharge groundwater, and provide floodplain habitat. Floodplain values in the Caneel Bay study area include providing wildlife habitat for wetland and riparian species, allowing for flood storage, and facilitating water conveyance.

The cottages at Scott Beach have shown significant damage from the 2017 hurricanes. **Figure 6** shows a photo of the Scott Beach Cottages taken in 2021. Based on remote observations (aerial and boat) the buildings appear to be destroyed with only foundations or rubble left. It can be assumed that water passes more freely through Scott Beach now versus prior to 2017 due to less standing structures being present in the floodplain.

The cottages at Hawksnest Beach North appear to be more intact than the cottages at Scott Beach based on visual observations from the water and review of aerial imagery. Impervious surfaces restrict water infiltration. It is assumed that the existing foundations of the Scott Beach and Hawksnest Beach North cottages continue to contribute impervious surfaces to the floodplain. Other features in the study area adding impervious surfaces include the roads leading up to the Turtle Point area.



Figure 6. Condition of the Scott Beach Cottages (2021)

Based on the FEMA Flood Insurance Rate Map dated April 16, 2007 (Flood Map Number 78000000326), the floodplains within the Caneel Bay area consist of Zone X and Special Flood Hazard Area Zones AE and VE (**Figure 7**). The Zone X flood zone is the area outside the 500-year floodplain. AE zones have a 1% chance of flooding (i.e., located within the 100-year floodplain) in a given year and VE zones are coastal areas with a 1% chance or greater of flooding and an additional hazard associated with storm waves. A base flood is a flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Areas in the Caneel Bay area have base flood elevations, or computed elevations to which floodwater is anticipated to rise during a base flood, associated with each of the flood zones. Historically, the entire resort, including the Scott Beach and the Hawksnest Beach North cottages, did not close on an annual basis until 2012. At that time, a decision was made to close the resort during hurricane season. The NPS is not aware of any flood warning systems on site to notify staff and visitors of storm events.

From a trend perspective, the changing climate is likely to increase coastal flooding in the USVI. As the oceans and atmosphere continue to warm, sea level is likely to rise one to three feet in the next century (USEPA 2016). Rising sea level submerges marshes, mangroves, and dry land; erodes beaches; and exacerbates coastal flooding. Over time, sea level rise also will change the floodplain location.

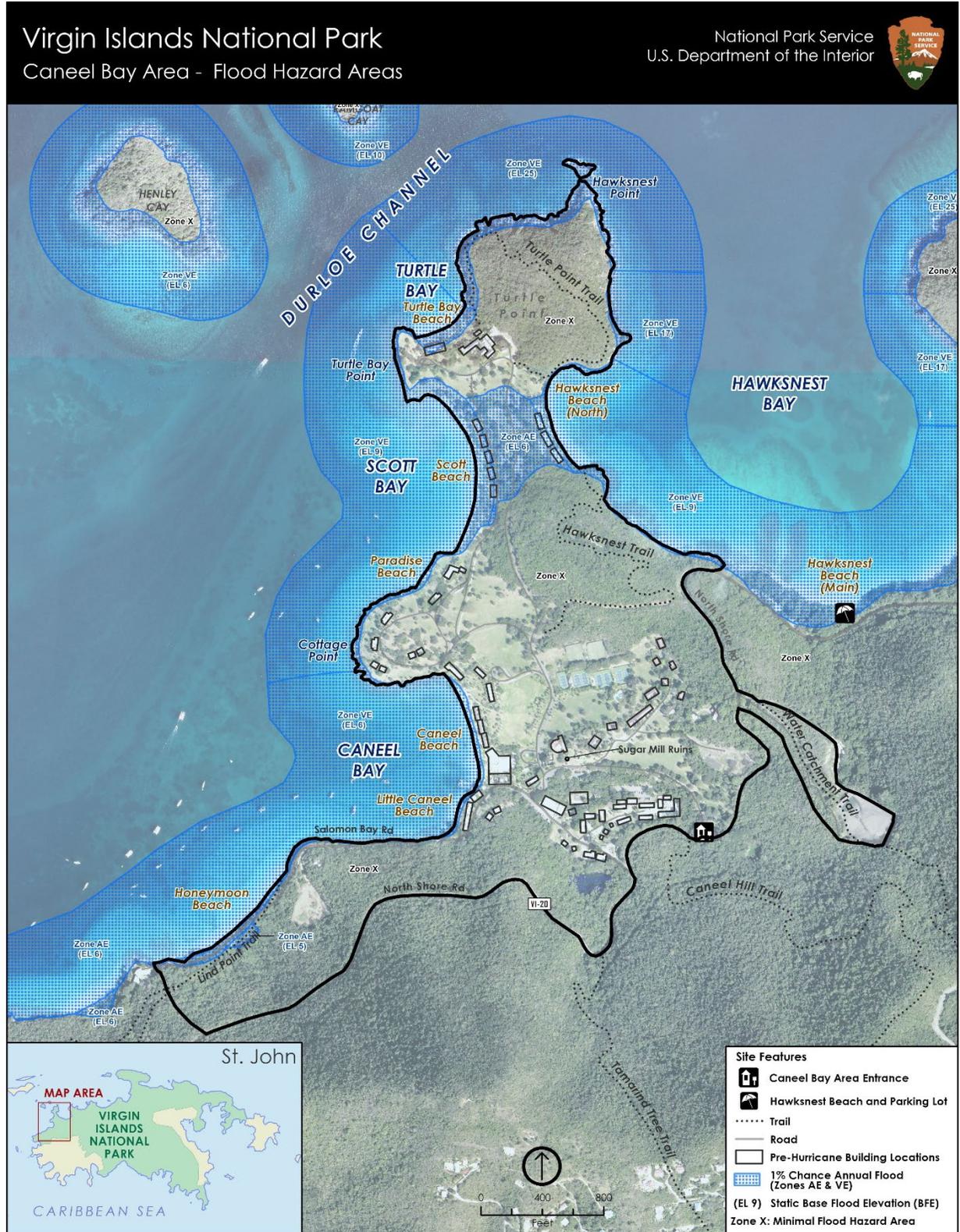


Figure 7. Flood Hazard Areas

As the NPS continues to conduct post-storm recovery actions resulting from past hurricanes at the Park, new or reconstructed facilities, such as those at Cinnamon Bay, are being relocated outside the floodplain, elevated above the floodplain, and/or floodproofed. The trend is for facilities at the Park to be made more flood resilient by locating buildings and structures away from or elevated above the floodplain. This building trend benefits the floodplain by allowing for more flood storage, improving habitat, and increasing water conveyance.

Reasonably foreseeable planned actions, such as the Salomon Bay Road Reconstruction, would affect the floodplain because reconstruction of the road could require stabilization of the shoreline where the road abuts the beach area. In addition, the lower areas of the road are likely within the floodplain. Impacts would be minimized by the NPS requiring the use of BMPs during construction for work in the floodplain, such as sediment and erosion control measures to minimize sediment runoff into nearby waters.

Environmental Consequences

Methodology. Potential impacts on floodplains are assessed based on the regulatory floodplains identified in the FEMA Flood Insurance Rate Maps (**Figure 7**). Floodplain impacts are characterized by the flow of water through the floodplain, as well as the risks to human safety and property caused by potential flood events. Resource-specific context for assessing impacts on floodplains includes a determination of the impact to the floodplain functions and values; impacts associated with occupancy, modification, and development of floodplains; and NPS policy to preserve floodplain values and minimize potentially hazardous conditions associated with flooding

Depending on the result of future building inspections and assessment of their historic integrity, the NPS could decide to remove these buildings from the floodplain, which would help restore floodplain functions and values such as water flow, storage, and habitat. In this case, Alternative A would have a benefit to the floodplain. However, this analysis considers the worst-case scenario for Alternative A assuming impervious surfaces would not be removed.

Alternative A: No-Action (No Redevelopment). Under Alternative A, floodplains would continue to be impacted by the presence of structures and impervious surfaces. The NPS would not repair or reconstruct the Scott Beach or Hawksnest Beach North Cottages that are within the regulatory floodplain. The existing remains of the damaged cottages would largely be left in place and no new construction would occur. The NPS would stabilize buildings for safety and resource protection and if deemed important to preserve as a contributing feature to the historic district. The buildings would remain vacant, and measures put in place to prevent entry and trespassing (such as boarding windows or entryways) without further impeding the flow of water. The presence of these structures would have a small adverse impact on flood flow in the context of the size of the floodplain. Keeping the remains of the existing structures at Scott Beach and Hawksnest Beach North would continue to impact floodplains because these structures impede water flows and limit water storage. In the context of the size of the floodplain, this impact is relatively small, as these structures comprise approximately 4% of the total floodplain in the study area.

Cumulative Impacts — Present and future planned actions affecting floodplains include the Salomon Bay Road Reconstruction. This project could impact the floodplain from the construction of a new road that is within the floodplain. The reconstruction of the road could require fill or retaining structures in the floodplain to protect the road from erosion due to its proximity to the shoreline. Any fill or retaining structure in the floodplain could impede water flow and limit water storage.

Alternative A would have an adverse impact on the floodplain because the Scott Beach and Hawksnest Beach North cottages would remain in the floodplain which impede water flow and limit water storage. When the incremental impact of Alternative A is added to present and reasonably foreseeable future action, the cumulative impact would be adverse with Alternative A contributing a small incremental impact.

Keeping the existing structures at Scott Beach and Hawksnest Beach North would continue to impact floodplains because these structures impede water flows and limit water storage. In the context of the size of the floodplain, this impact is relatively small, as these structures comprise approximately 4% of the total floodplains in the study area. Under Alternative A, the buildings at these two locations would not be habitable and would therefore, not pose a risk to human safety from occupancy during a flood event. If buildings were to remain, Alternative A would have a minimal adverse impact on the floodplain because the existing buildings impede water flow and limit storage.

Alternative B: Proposed Action (Redevelopment). For the purposes of this analysis, the NPS assumed that the buildings at Scott Beach and Hawksnest Beach North would be rehabilitated or replaced at these sites. These two locations show low suitability for development; however, this analysis includes these locations to ensure impacts to floodplains are appropriately analyzed and disclosed. For any redevelopment activities in the floodplain, the NPS would assess its impacts on the floodplain in accordance the requirements outlined in *Director's Order 77-1 Floodplain Management* and a Statement of Findings for Floodplain Management would be prepared.

Replacement and/or rehabilitation of the existing structures, such as Scott Beach or Hawksnest Beach North Cottages, would be determined in collaboration with a developer or operator that is selected by the NPS using a competitive commercial services process. One objective of this process is to encourage creativity while prescribing conditions for the redevelopment. One condition of redevelopment activities would incorporate methods for minimizing storm damage in accordance with the National Flood Insurance Program' Floodplain Management Criteria for Flood Prone Areas (44 CFR 60.3). In addition, redevelopment would have to fulfill the VI DPNR requirements for action occurring in regulatory designated coastal zone. Future plans could propose raising structures above the base flood elevation, similar to construction at the Cinnamon Bay Campground. By elevating structures in this way, flood risks and potential for damage would be minimized.

Replacement or reconstruction of the cottages at Scott Beach or Hawksnest Beach North would displace a small volume of flood waters and affect floodplain functions and values, primarily water storage. Also ground disturbance during construction, although expected to be small, 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 very small in the context of the size of the floodplain. Any replacement structures would likely need to be temporary and removable

(like the eco-tents at Cinnamon Bay Campground) or the structure raised above the flood elevation. Risks to human health and safety associated with the replacement structures would 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 would maintain an active hurricane evacuation plan that would detail responsibilities of individual Park employees for advanced preparedness measures at the onset of the hurricane season. Hurricane plans have proven effective in maintaining safety and reducing property damage to the extent possible during storms and would be reviewed and updated regularly. Actions taken under a hurricane plan that affect an operator would be communicated to the operator in advance.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions, along with implementation of this alternative would have adverse impacts on the floodplain. For instance, the Salomon Bay Road Reconstruction project could impact the floodplain from the construction of a new road that is within or abuts the floodplain. The reconstruction of the road could require fill or retaining structures in the floodplain to protect the road from erosion due to its proximity to the shoreline. Any fill or retaining structure in the floodplain could impede water flow and limit water storage. Alternative B would contribute an adverse incremental impact if the redevelopment replaced the existing structures in the floodplain because these structures could impede water flow and limit water storage. This incremental impact of Alternative B would be small because, in general, new construction and redevelopment would follow 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]). When this impact is added to present and planned actions, there would be an adverse cumulative impact to floodplains.

Conclusion. Overall, the rehabilitation or replacement of the Scott Beach and Hawksnest Beach North cottages identified in Alternative B would adversely impact the floodplain by continuing to include structures and impervious surfaces within the floodplain, although this is not a large change from the current condition. 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 would 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 would have a beneficial impact on water quality.

Elevating and/or removing the structures under Alternative B would have less impacts to the floodplain when compared to Alternative A, which would not fully remove all the structures. Alternative B would follow the latest guidance on mitigation and minimization measures for structures in the floodplain as noted above. In comparison, under Alternative A, structures would not be altered to meet existing

standards, as the development occurred prior to the implementation of these standards. As a result, the redevelopment under Alternative B would reduce impacts to the floodplain from past development of the resort. For either alternative, the impacts would be small in scale in the context of the total floodplain footprint at VINP.

SOCIOECONOMICS

Current and Expected Future Conditions of the Environment

The Park continues to be an attractive destination for many visitors from St. Thomas, cruise ships, and travelers from around the world, all of which support local businesses and concession operations and contribute significantly to the local tourism-based economy. St. John's economy has been predominantly dependent on tourism, and approximately 60% of the island is the national park.

Historically, the Caneel Bay Resort generated an increase of visitation to the island, which resulted in economic expansion and an increase in employment on St. John. Before the 2017 hurricanes, the island was experiencing growth in tourism and permanent and seasonal residents. However, the 2017 hurricanes and the COVID-19 pandemic had a direct impact on Park visitation, which impacted the local economy of St. John and neighboring St. Thomas.

Based on a fact sheet prepared by the current RUE operator in 2018, the Caneel Bay Resort was the largest employer on St. John, bringing in more than 15,000 guests and over \$65 million in direct annual spending to the island, which accounted for 7% of total employment in the USVI hotel and restaurant sector (CBI Acquisitions LLC 2018). Since 2017, there has been a noticeable decline in visitation and therefore visitor spending. Prior to its closure, the resort operated 166 guest rooms and provided approximately 400 jobs. As expected, employment associated with the resort operations also declined following the hurricanes.

Since the 2017 hurricanes, the resort has been inoperable, providing no public guest lodging and thus very few employment opportunities. The resort did provide lodging to relief workers and NPS employees deployed to VINP for several months after the hurricanes. The income generated after 2017 in the Caneel Bay area was from the concession operations at Honeymoon Beach and sale of water from the water plant. In late 2021, ZoZo's restaurant reopened and again has become a source of income and provides employment opportunities. The existing commercial water plant remains operational, providing water to local St. Johnians for a fee.

Based on the 2022 NPS report, *Social Sciences Visitor Spending Effects – Economic Contributions of National Park Visitor Spending*, from 2012 to 2016, total visitor spending at VINP was between \$59.8 million and \$69.9 million (NPS 2022a). Then, visitor spending dropped to \$42.5 million in 2017, \$16.3 million in 2018, \$19.5 million in 2019, and \$24.1 million in 2020 (NPS 2022a; NPS 2020). Overnight lodging in the Park as a whole decreased from 17,348 stays in 2014 to 3,597 stays in 2017 (NPS 2022b). From 2017 to present, overnight lodging has not been available at Caneel Bay to the public.

Parkwide in 2021, 324,000 Park visitors spent an estimated \$49.3 million in local gateway communities while visiting VINP (NPS 2022a). These expenditures supported \$24.4 million in labor income, \$46.0 million in value added, and \$69.6 million in economic output in local gateway economies surrounding VINP (NPS 2022a, 2022b). From a visitor spending perspective, the trend is that jobs associated with visitor spending have declined as expected since the 2017 hurricanes. In 2013, 798 jobs contributed to VINP and its gateway communities. In 2018, total jobs decreased to a low of 188 but, by 2021, have increased to 565 jobs (NPS 2022a).

Current and ongoing construction of large-scale resorts near the Caneel Bay area and surrounding islands, such as St. Thomas, is increasing with Marriott expecting to open the Noni Beach Resort and reopen the Frenchman's Reef Beach Resort and Spa following a \$250 million reconstruction (Global Property Guide 2022). The imminent opening of Fisherman's Reef on St. Thomas—the largest hotel complex area in USVI—shuttered since the 2017 hurricanes is also expected to stimulate the economy for the USVI, including likely increasing visitation to St. John (i.e., day trip visitors from resorts in St. Thomas). Projects, such as recent storm recovery projects, have had a positive impact on socioeconomics, such as the reopening and renovation of the Cinnamon Bay Campground providing local employment opportunities, with the vast majority of the employees being long-term residents of the USVI.

The trend of increasing short-term rental properties used by tourists has caused property values to increase on St. John, and concerns were raised during the civic engagement about local St. Johnians being able to find affordable housing. According to the Global Property Guide (2022), St. John has the most expensive rental houses and villas in the USVI. Monthly rents for one-bedroom apartments range from \$1,000 to \$2,500. Three to four-bedroom beach houses can cost from \$2,500 to \$7,000 per month (Global Property Guide 2022). After seeing a decline in the housing market following the 2017 hurricanes, in 2019, the housing market rebounded seeing home prices rising by 7.9%. This market has continued to grow with home sale prices increasing in 2020 by 4% in St. John (Global Property Guide 2022).

Revenue generated from recreation fees at VINP drastically declined in 2018 and 2019 before returning to pre-hurricane levels in 2021. Revenues from recreation fees from 2016 to 2021 were \$897,725; \$931,170; \$30,065; \$319,406; \$504,508; and \$926,832, respectively. Another notable trend was the increase in commercial services gross sales for items such as beach rental equipment, as well as food and beverages that met or exceeded pre-hurricane levels. For example, rental equipment sales at Trunk Bay increased over 300% from 2016. In the same year, Trunk Bay also saw a 500% increase in food and beverage sales when compared to pre-hurricane conditions.

In addition, the government of the USVI aims to construct a new K-12 school on St. John, eliminating the need for students to commute to St. Thomas and increasing complement and training opportunities during the school year. This would help reduce travel costs and time for St. Johnians and could have a beneficial impact on socioeconomics from added employment from construction and operation of the school.

Environmental Consequences

Methodology. The analysis used information obtained from the US Census Bureau, NPS statistical data on overnight stays, VINP visitation and economic data, and operating conditions statistics on the resort. Impacts on socioeconomics were evaluated based on the professional judgment of NPS staff and were assessed in terms of expenditures from tourism and economic output, availability of employment and business opportunities, and local community involvement.

Alternative A: No-Action (No Redevelopment). Under Alternative A, socioeconomic conditions would be similar as described in the “Current and Expected Future Conditions of the Environment” section. However, under this alternative, the NPS would increase public access to the site. Alternative A also would make available for public use of the beaches but without visitor services provided by a commercial services agreement. Adding seven beaches for public use could result in increased 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. Alternative A also would have an adverse impact to socioeconomics as no redevelopment would result in lost opportunities to support the local economy, create new jobs, and provide opportunities for local business.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions would be beneficial. For instance, if construction of a new K-12 school on St. John occurs, it eliminates the need for students to commute to St. Thomas and increasing complement and training opportunities during the school year on the island, there would be improvements on St. Johnians’ quality of life by eliminating the need for students to commute to St. Thomas. In addition, the reopening of the Cinnamon Bay Campground resulted in a beneficial impact on socioeconomics from added employment and amenities for St. Johnians and guests to the Park.

As described in the impact analysis, implementation of Alternative A would have a net adverse impact because no redevelopment would result in lost opportunities to support the local economy, create new jobs, and provide opportunities for local business. When the impacts of Alternative A are combined with present and reasonably foreseeable planned actions, there would be no adverse cumulative impact because overall, the present and reasonably foreseeable projects would have a beneficial impact.

Overall, the socioeconomics of St. John have changed drastically following the 2017 hurricanes. Before these storm events, the resort was a major contributor to local employment and visitor spending on the island. After 2017, visitation to St John drastically decreased and visitor spending and job creation plummeted as well. The closure of the resort contributed to this decline. Alternative A would increase access to the site for use of the beaches but without visitor services provided by a commercial services agreement. Adding an additional seven beaches for public access could increase visitation to the island but it is not expected to measurably impact the socioeconomics of the island. Alternative A would continue the existing socioeconomic conditions.

Alternative B: Proposed Action (Redevelopment). Under Alternative B, the NPS would work with a developer or operator to redevelop the Caneel Bay area. The redevelopment of the Caneel Bay area to include lodging and visitor amenities would immediately create a significant number of construction jobs, along with opportunities for ancillary trade and wholesale businesses in the USVI. After construction, lodging of up to 166 guest rooms would be provided, similar to the capacity of the resort

when it was in operation. Lodging and accommodations at various price points would be provided, so a guest experience at the Caneel Bay area would be available to a range of demographics. There would be opportunities for hiring staff for the redevelopment of the overnight lodging and visitor amenities in the Caneel Bay area. 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. To accommodate employment for the operation of overnight lodging, 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. Additional site-specific compliance would be completed on additional employee housing, as applicable.

In addition to lodging and employment, opportunities for a designated space for a community area could be provided. Though a partnership, VINP and the local community could operate a community center, heritage center, or amphitheater, for cultural events, education programs, and other activities. This community area could 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 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 other amenities that would be available at the Caneel Bay area (i.e., 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.

In future commercial use planning processes, the RFP would seek ideas from developers to guide redevelopment following the objectives and prescribed conditions under Alternative B. However, there would be the opportunity for additional criteria to be included in the RFP, where appropriate. The 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.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions would have a net beneficial impact to socioeconomics. For instance, if construction of a new K-12 school on St. John occurs, it eliminates the need for students to commute to St. Thomas, improving St. Johnians' quality of life. The construction of a school would also have a beneficial impact from added employment from construction and operations of the school. In addition, the reopening of the Cinnamon Bay Campground resulted in a beneficial impact on socioeconomics from added employment and amenities for St. Johnians and guests to the Park. Alternative B would add a noticeable incremental net benefit by creating a significant number of construction jobs, along with opportunities for ancillary trade and wholesale businesses; and during operations, would provide a range of employment and career development opportunities for Virgin Islanders as well as opportunities for local vendors and business owners to support the lodging operations. The redevelopment would also draw additional visitors that would help to support the local tourism industry. Collectively, there would be a long-term beneficial cumulative impact on socioeconomics.

When combined with the local spending by staff employed at the Caneel Bay area, the economy and employment levels on St. John and neighboring St. Thomas could increase. The redevelopment of the area would be expected to reintroduce tourism dollars into the local economy that would support artists, food vendors, and other local businesses. Therefore, there could be short-term beneficial impacts as a result of the construction-related operations for the redevelopment of the Caneel Bay area and long-term beneficial impacts to socioeconomics in the Caneel Bay area, St. John, and neighboring St. Thomas through the operations and lodging provided at the Caneel Bay area.

Conclusion. Under Alternative B, the NPS would aim to provide enhanced public access, recreational opportunities, and resource protection, while reestablishing an overnight experience at the Caneel Bay area. The overall effect on socioeconomics, as compared to post-hurricane conditions, would be long-term and beneficial. The reestablishment of an overnight guest experience with up to 166 guest rooms with supporting amenities, would bring back the benefit to the local economy of the resort which existed prior to the 2017 hurricanes. Alternative B provides economic benefits to the local community through increased 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.

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, employment, and opportunities for local businesses. Alternative A would not provide such benefits to the local economy as no overnight lodging would be provided. Alternative B also would provide—through a partnership—community spaces to jointly operate a community center, heritage center, or amphitheater for cultural events, educational programs, and other activities.

VISITOR USE AND EXPERIENCE

Current and Expected Future Conditions of the Environment

VINP has provided unparalleled opportunities to experience scenic views of natural and cultural features of St. John—from historic ruins and forested hillsides and peaks to undeveloped beaches. The clear turquoise water of the Park creates the backdrop for these iconic scenes. Each year, hundreds of thousands of visitors enjoy and experience all that the Park has to offer, including an abundance of recreational opportunities. Many visitors participate in boating, snorkeling, diving, hiking, camping, picnicking, photography, wildlife observation, night-sky viewing, swimming, and fishing (NPS 2016a).

Before the 2017 hurricanes, the Caneel Bay Resort served as a popular destination for visitors to experience the many opportunities offered at the Park. The property was used as a resort consisting of a network of structures for guest enjoyment, including guest rooms, several restaurants and bars on-site, a meeting and banquet area, a boat dock, SCUBA [self-contained underwater breathing apparatus] center, massage center, meditation studio, children's daycare facility, and gym. The Turtle Bay area at the Caneel Bay Resort, was commonly used for events such as weddings. The Caneel Bay Resort included a large network of support buildings, such as staff kitchens, laundry service, wastewater treatment, a desalination plant, maintenance area, and security offices.

Visitor use in the Caneel Bay area has never been managed by the NPS. Access for day-use visitors is restricted throughout the RUE property; however, visitors are allowed to access the beaches from the water. Access to the shoreline, including the beaches of the Caneel Bay area, is permitted by the Virgin Islands VI Open Shoreline Act (VI Code Title 12 Section 402). The Act gives the public the right to use and enjoy the shoreline of the USVI. "Shorelines of the USVI" include the area along the coastline from the seaward line of low tide, running inland a distance of 50 feet, to the extreme seaward boundary of natural vegetation, which spreads continuously inland; or to a natural barrier, whichever is the shortest distance. Many of the beaches in the Caneel Bay area are accessible by boat or by foot, including Honeymoon Beach.

As a result of the 2017 hurricanes, the resort is currently not in operation and is closed to the public. Previously, there were cabanas and other visitor services located on Honeymoon Beach that were privately run, but these operations, including the shuttle service to Honeymoon Beach, closed at the beginning of 2022. Towards the end of 2022, a new commissioner commenced operations. In recent years the Honeymoon Beach concession operation saw many visitors originating from cruise ships from the area. Visitors to Honeymoon Beach can access the beach by boat or the Lind Point Trail. Visitors wishing to access other beaches in the vicinity, such as Scott Beach, Turtle Point Beach, Hawksnest Beach North and Caneel Beach, must do so via private boat. Access through the rest of the RUE property is restricted. At the end of 2021, the restaurant (ZoZo's at Caneel Bay) reopened providing a new experience for visitors at the site.

The Park continues to rebuild infrastructure to support visitor services, such as the hurricane recovery projects at Cinnamon Bay. Other recent (i.e., 2019 through 2022) visitor use improvement projects conducted by the NPS include revegetation of native plants and shade trees at Park beaches; repairs to comfort stations at Francis Bay, Annaberg, Salt Pond, and Lameshur; and restoration of the St. John Ball Park at the Cruz Bay Visitor Center, which serves as a little league field and community space (NPS 2021b). Planned projects expected to be completed in 2023 through 2026 include the opening of the archeology lab and museum collections building on Lind Point; mangrove plantings; coral propagation and coral plantings; a new wastewater treatment plant at Trunk and Cinnamon Bays; replacement of NPS pier and repairs to the bulkhead in Cruz Bay; playground repairs; proposed public restroom renovations at the Cruz Bay Visitor Center, including with new shade structures; proposed replacement of Reef Bay waysides; and proposed stabilization of Annaberg and Reef Bay historic structures.

Like most national parks, the trend is that increased visitation and aging infrastructure present challenges to providing sufficient visitor services and maintaining or improving the visitor experience. Climate change also could impact the natural and cultural resources of the USVI by degrading the environment with increasingly severe and possibly more frequent storms and droughts, rising sea temperatures, and inundation of the coastline, all of which have the potential to affect quality of life and visitor experience (NPS 2016a). The 2017 hurricanes and the COVID-19 pandemic had a direct impact on Park visitation from 2017 to 2020, when visitation dropped to a low of 112,287 in 2018 (National Parked 2022). Visitation is trending upward as travel restrictions from the COVID-19 pandemic are lifted but is still below historical levels prior to the hurricanes. Visitation at the Park in 2020 was 168,000 (NPS 2022b) and increased to 324,000 Park visitors in 2021 (NPS 2022b).

The NPS continues to conduct storm recovery projects and make other improvements at the Park to improve the visitor experience and accommodate use. Ongoing and past projects, such as recent storm recovery projects (i.e., the renovation of Cinnamon Bay Campground), have had a positive impact on visitor use and experience by upgrading facilities to meet current code and accessibility requirements. There are ongoing or planned projects, such as the WAPA utility project along North Shore Road, that could result in road closures on North Shore Road, which could cause temporary delays getting to and from the Park during construction.

Environmental Consequences

Methodology. When assessing impacts on visitor use and experience, the NPS used the professional judgment of the NPS staff while also considering the comments received during civic engagement. Visitor use and experience was assessed in terms of historical and anticipated use, site access, recreational opportunity, and access to information and interpretation.

Alternative A: No-Action (No Redevelopment). Under Alternative A, the NPS would take minimal steps to ensure visitor use and experience would remain essentially unchanged from existing conditions. The NPS would minimally restore the site to allow for safe access by visitors through existing roads and trails, including access to beaches. Additional study would be needed to determine the conditions of the roads and the ability to provide safe access including the degree to which parking can be made available. The NPS may install some wayfinding signage to aid in access to beaches. Under Alternative A, the NPS would take minimal steps to ensure visitor safety around structures, buildings, roads, and trails.

The benefit or impact of Alternative A would depend on the visitors' desired experience at Caneel Bay. For those visitors wanting a more secluded experience with limited visitor services, the visitor experience could be perceived as beneficial. For visitors who prefer expanded visitor services, facilities, and accommodations, the perception could be the visitor experience is not desirable as visitor services are lacking. In addition, it is likely there is a high potential for overcrowding at the Caneel Bay area, due to the site's proximity to Cruz Bay, which would strain the limited facilities and potentially impact natural and cultural resources. VINP currently offers visitors a range of experiences at its beaches, some with visitor services such as Trunk Bay and others without visitor services such as Salt Pond. As a result, there is not necessarily a need for one experience over the other at the VINP.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions would have a net beneficial impact to visitor use and experience. VINP currently offers visitors a range of experiences at its beaches, some with visitor services such as Trunk Bay and others without visitor services such as Salt Pond. The reopening and renovation of Cinnamon Bay Campground offers visitors expanded opportunities including day use visitor services and overnight lodging, and enhanced access to Cinnamon Bay Beach. Alternative A would have an overall beneficial impact when compared to today's condition because of increased access, however, NPS would not provide visitor services and amenities at the site. Collectively, there would be beneficial cumulative impacts with Alternative A contributing a small incremental benefit because of increased access for visitors to use the beaches and explore the natural areas in the Caneel Bay area.

Alternative B: Proposed Action (Redevelopment). Under Alternative B, the NPS would aim to provide a range of visitor experiences, including overnight and day-use opportunities, while preserving and protecting significant cultural and natural resources within the Caneel Bay area. Visitors looking for varying uses and experiences could benefit from redevelopment activities. Visitor experience would be a key consideration in the RFP development and future redevelopment plans in coordination with the NPS. The following is a summary of the potential impacts to visitor use and experience resulting from Alternative B within each of the proposed management zones as described in **Table 2**.

The proposed redevelopment under Alternative B could result in an increase in visitation to the Park and could result in visitors extending their stay in the area. The Caneel Bay area would offer visitors a barrier free and accessible recreation area, which is limited outside the Park, and the accessibility to a wide array of users would make it a popular destination for those staying in Cruz Bay and surrounding communities. For these reasons, there would be a net benefit on visitor use and experience.

Lodging Zone — Within the Lodging Zone, guests would be provided an overnight experience commensurate to Laurance Rockefeller’s vision and site history for the Caneel Bay area. The overnight experience would be that of a twenty-first century eco-resort with lodging with a variety of amenities such as, but not necessarily limited to, lodging, dining, gift shops, employee housing, and associated infrastructure to support the overnight guests. The operator would 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 would 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 within the Lodging Zone would be long-term and beneficial.

Day-use Zone — Local St. Johnians, visitors, and overnight guests would be provided access for recreation and day-use to several beaches within the Caneel Bay area, many of which have been closed to the public since the 2017 hurricanes, and before that for non-resort guests. In these areas, visitors would be provided amenities such as food services, picnic areas and tables, watersports and beach equipment rentals, and facilities including restrooms and showers. Management of the Day-use Zone by the NPS would be consistent with other public beaches within the Park, and commercial services contracts would be used to provide any necessary visitor services. Improved wayfinding and dedicated access routes to beaches also would be implemented within the Day-use Zone, which would provide improved and expanded visitor opportunities to explore the Caneel Bay area. As such, impacts to visitor use and experience in the Day-use Zone would be long-term and beneficial for those visitors seeking increased access to the Caneel Bay area.

Conservation Zone — Under Alternative B, the Conservation Zone would be managed by the NPS and would remain natural and undeveloped for visitor use and enjoyment. Within this zone, visitors looking for this type of experience would be able to connect with the natural areas of the Park through trails and pedestrian access on some existing roads throughout the Caneel Bay area. There would be limited expansion of pedestrian trails, as well as reestablishment of Turtle Point and Hawksnest Trails, to support pedestrian connectivity throughout the site and to allow visitors to access various locations in a non-motorized fashion. Because most of the site is not accessible to the general public, the increased access to the natural areas at Caneel Bay would be a benefit. Therefore, impacts to visitors looking to access and enjoy undeveloped resources of the Caneel Bay area would be long-term and beneficial.

Interpretive/Engagement Zone — The Interpretive/Engagement Zone would provide greater opportunities 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, as described earlier in this EA. An increased NPS presence would be available in this zone to assist in site interpretation, wayfinding, and general orientation. Impacts on visitor use and experience to those visitors seeking a more interpretive experience within the Caneel Bay area would be long-term and beneficial.

Zones with No Visitor Use — The Operations/Maintenance Zone and Flexible Development Zone would primarily be used to support overnight lodging operations and maintenance activities and would include lands that were previously disturbed and available for future operator(s) to utilize as part of their operations. These zones would have no anticipated visitor access or visitor uses. To the extent feasible, consideration would be given to screen operations in these zones from publicly accessible areas to minimize visual impacts on visitor experience.

Cumulative Impacts — The impacts of present and reasonably foreseeable planned actions would have a net beneficial impact to visitor use and experience. For instance, the reopening and renovation of Cinnamon Bay Campground offers visitors expanded opportunities including day use visitor services, overnight lodging, and access to Cinnamon Bay Beach. Alternative B would have an overall beneficial impact when compared to today’s condition because of increased equitable access and by providing a range of day-use and overnight lodging options to visitors. Collectively, there would be beneficial cumulative impacts with Alternative B contributing a noticeable incremental beneficial impact in the context of the visitor opportunities at VINP.

Conclusion. Under Alternative B, the NPS would aim to provide enhanced public access, recreational opportunities, and resource protection while reestablishing an overnight experience at the Caneel Bay area. The overnight experience would be commensurate of a twenty-first century eco-resort consistent with the past uses of the site. The management zones described in this EA (**Table 2**) identify appropriate uses of the site. The zoning helps accommodate different visitor uses and experiences such as overnight lodging, day use at beaches, interpretive opportunities, and outdoor recreational experiences. Alternative B also would improve access to all users and would make areas more welcoming by establishing an NPS presence onsite, including a visitor contact station near the entrance. Alternative B would result in an overall long-term benefit by offering a variety of the visitor uses and experience that are currently not offered at the site. The benefit would be noticeable to most residents, guests, and visitors of the Park.

When compared to Alternative A, Alternative B would provide a range of visitor opportunities and a better balance of improved public access, greater recreational opportunities, and enhanced resource protection. Alternative B also would provide a greater opportunity for visitors and guests to learn about St. John’s local history as compared to Alternative A, which would not accomplish this NPS objective.

CHAPTER 4: CONSULTATION AND COORDINATION

PUBLIC PARTICIPATION AND CIVIC ENGAGEMENT

Civic engagement is a continuous, dynamic conversation with the public on many levels that reinforces public commitment to preserving heritage resources, both cultural and natural. The input obtained from the public was used to help shape the action alternative and was useful in understanding existing resources and potential impacts on the community, resources, and visitors.

Community Engagement for the Environmental Assessment in 2021-2022

Beginning in April 2021, the NPS met with the community at large to discuss and listen to their visions for Caneel Bay including ideas and concerns about future redevelopment. The NPS closely reviewed and discussed the more than 1200 comments submitted and transcripts from the April 2021 listening sessions and used this information to inform later community involvement and this planning effort as a whole.

The NPS continued civic engagement in January 2022 that included a 45-day public comment period from January 18, 2022, to March 4, 2022. The effort was announced through a press release, the Park's mailing list, which included eight local non-governmental organizations, government officials, consulting agencies, CUA holders, and approximately 1,000 individuals and organizations from the USVI and across the country. The public was invited to share their ideas on the future redevelopment and management of the Caneel Bay area and provide feedback on an informational newsletter, a Frequently Asked Questions (FAQ) document, and a virtual public meeting presentation on February 8, 2022. All documents were provided as printed materials, digitally through email, and provided through the PEPC system. In addition, the press release resulted in seven articles being published in local, high-circulation print and online media outlets in the USVI.

The NPS printed and distributed 150-200 newsletters with cover letters specific to seven community groups and their members including:

- Coral Bay Community Council
- Friends of Virgin Islands National Park
- Island Green Living Association
- St. JanCo
- St. John Community Foundation
- St. John Historical Society
- St. John School of the Arts

Each organization was encouraged to share the newsletters with their members. The NPS received additional support from Love City Strong who helped to distribute the newsletter.

During the week of January 10, 2022, the NPS provided a briefing to the US Department of the Interior Congressional Affairs Office, Senator Angus King's staff, and the senior attorney for the US Senate Energy and Natural Resources Committee. During the week of January 18, 2022, the NPS provided a briefing to the VI Governor's Office and the VI Delegate to Congress.

In February 2022, the NPS hosted a series of meetings and outreach events to reach the public and a wide array of interested stakeholders. Each meeting began with a PowerPoint 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. In advance of the public meetings, the NPS posted a recording of the PowerPoint presentation and a PDF of the slides to PEPC for public review. 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>.

The NPS hosted the following meetings:

- Business Community – On February 3, 2022, the NPS hosted a virtual meeting with the business communities of St. John and St. Thomas and welcomed 35 participants.
- Local Community Groups – On February 4, 2022, the NPS hosted a virtual meeting with local community groups. The meeting was attended by 47 participants, representing more than seven community groups from the VI.
- Virtual Public Meeting – On February 8, 2022, the NPS hosted a virtual public meeting welcoming 241 participants. A recording and transcription of the February 8 public meeting were posted to PEPC for public review.

Considering input from the public and other stakeholders received during the public meetings and other communications, the NPS extended the public comment period resulting in a 45-day public comment period. This announcement was made via press release, social media, the Park's website, PEPC, and during the public meeting on February 8, 2022.

On February 24, 2022, the NPS participated in a special session of the St. John Pastoral Committee meeting with representatives from many of the churches on St. John. During this meeting, the NPS provided a brief presentation on the process, followed by a Q&A session.

On February 25, 2022, the NPS posted an updated FAQ document that considered new questions asked during the public meetings.

Although this event was not an NPS-sponsored meeting and the NPS did not participate, on February 27, 2022, Governor Albert Bryan hosted a listening session on Caneel Bay for community members to provide up to two minutes of comments.

The week of February 27, 2022, the NPS participated in two additional in-person listening sessions hosted by the Bethany Moravian Church in Cruz Bay on March 2, 2022, and the Calvary Baptist Church in Coral Bay on March 4, 2022.

Lastly, the Park hosted open house hours for four days during the week of March 1, 2022, at the Park's Visitor Center to answer questions and help the community submit written comments. The open house was announced using social media and a news release dated February 26, 2022. Comments were also accepted at the meetings, by mail, and in person at the Park.

The results of the public comment period were presented in a summary report released in spring 2022, which is available on the NPS PEPC website at <http://parkplanning.nps.gov/CaneelBayRedevelopment>. All correspondences not directly entered into PEPC by the commenter were manually entered by the NPS. A total of 723 correspondences were received during the comment period. The information obtained during this comment period was used to refine the alternatives in this EA and assess the impacts of those environmental issues pertinent to the decision-making process.

Community Engagement for the Environmental Investigation at Caneel Bay 2021-2022

NPS coordinated a parallel project concerning contamination in specific locations of the Caneel Bay area. Civic engagement was an important part of that effort to investigate the contamination and evaluate removal action alternatives to address hazardous substances which threaten human health or welfare or the environment. The initial investigation began in 2012 yet coincided with the post-2017 hurricanes redevelopment effort. As noted earlier in this EA, the environmental investigation, formally known as an EE/CA, is a key antecedent to this redevelopment and management plan. To keep the public informed of its progress, NPS launched a series of information notices, publicly available materials, and public meetings to inform and engage the public on the study results, which is summarized in **Appendix C** of this EA.

AGENCY CONSULTATION

Agency consultation is the early involvement of federal, state, local, and Tribal government agencies that may be affected by the federal action, have regulatory purview for its actions, or offer subject matter expertise to aid in understanding of the consequences of an action or project. Early involvement allowed these agencies to comment and contribute to planning and the decision-making process. Their comments were considered in developing the EA. These agencies also helped the NPS identify key issues and requirements to be considered in NEPA documentation, as well as future permitting requirements. Each of these agencies will be notified of the EA availability and will be asked to review and comment on this EA during the public review period. During planning leading up to this EA, the NPS took the following steps to engage agency stakeholders:

- 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 Marine Fisheries 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 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, VISHPO concurred with the finding and the NPS commitment to continue consultation with 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.

REFERENCES

Ausherman, Betty

1982 St. John Sites Report. On file, NPS.

CBI Acquisitions LLC

2018 Fact Sheet – May 2018. CBI Acquisitions LLC (CBIA) for Caneel Bay Resort. May 2018.

Council on Environmental Quality (CEQ)

1997 Environmental Justice: Guidance Under the National Environmental Policy Act. Available Online: https://www.energy.gov/sites/default/files/nepapub/nepa_documents/RedDont/G-CEQ-EJGuidance.pdf. Accessed November 9, 2022.

2014 Memorandum for Heads of Federal Department and Agencies: Effective Use of programmatic NEPA reviews. December 18. Available Online: https://ceq.doe.gov/docs/ceq-regulations-and-guidance/Effective_Use_of_Programmatic_NEPA_Reviews_Final_Dec2014_searchable.pdf. Accessed November 1, 2022.

Global Property Guide

2022 USVI's Property Market Gathering Pace. Available Online: <https://www.globalpropertyguide.com/Caribbean/US-Virgin-Is/Price-History>. Accessed October 6, 2022.

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)

2001 Mothballing Historic Buildings. *Preservation Briefs* 31. National Park Service, US Department of the Interior. March 2001. 14 pp.

2011 Virgin Islands National Park Draft General Management Plan and Environmental Impact Statement.

2015 National Park Service NEPA Handbook.

2016a Foundation Document. Virgin Islands National Park and Virgin Islands Coral Reef National Monument. National Park Service, US Department of the Interior. December 2016. 72 pp.

- 2016b Green Parks Plan, Advancing Our Mission Through Sustainable Operations, National Park Service, US Department of the Interior. Spring 2016. 6 pp.
- 2018 Virgin Islands National Park. Hopewell Furnace National Historic Site, Tuskegee Institute National Historic Site, Virgin Islands National Park, Virgin Islands Coral Reef National Monument. Available Online: <https://www.nps.gov/places/virgin-islands-national-park.htm>. Accessed March 22, 2022.
- 2020 Cullinane Thomas, C., and L. Koontz. 2021. 2020 national park visitor spending effects: Economic contributions to local communities, states, and the nation. Natural Resource Report NPS/NRSS/EQD/NRR—2021/2259. National Park Service, Fort Collins, Colorado. <https://doi.org/10.36967/nrr-2286547>.
- 2021a Director's Order #2: Park Planning. National Park Service. January 11. Available Online: https://www.nps.gov/subjects/policy/upload/DO_2_1-11-2021.pdf. Accessed November 9, 2022.
- 2021b Blueprint for Recovery. National Park Service, Virgin Islands National Park. Available Online: <https://www.nps.gov/viis/learn/management/blueprint-for-recovery.htm>. Last updated June 21, 2021. Accessed October 5, 2022.
- 2022a Social Sciences Visitor Spending Effects – Economic Contributions of National Park Visitor Spending. Online: <https://www.nps.gov/subjects/socialscience/vse.htm>. Accessed October 20, 2022.
- 2022b Stats - Park Reports. Available Online: <https://irma.nps.gov/STATS/Reports/Park/VIIS>. Accessed August 17, 2022.

National Parked

- 2022 Virgin Islands Visitation by Year. Available Online: <https://www.nationalparked.com/virgin-islands/visitation-statistics>. Accessed March 28, 2022.

Nicholls, Robert

- 2006 Remarkable Big Trees in the US Virgin Islands: An Eco-Heritage Guide to Jumbie Trees and Other Trees of Cultural Interest. University of the Virgin Islands and the Urban and Community Forestry Assistance Program, VI Department of Agriculture.

US Environmental Protection Agency (USEPA)

- 2016 What Climate Change Means for the US Virgin Islands. Available Online: <https://19january2017snapshot.epa.gov/sites/production/files/2016-11/documents/climate-change-usvi.pdf>. Accessed October 4, 2022.

- 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.

Wild, Ken

- 2022a VIIS Caneel Bay Area Redevelopment and Management Plan (PEPC 101399) Cultural Resources. Draft on file, NPS.
- 2022b Summary of on-going adverse impacts to cultural resources at Caneel Bay Resort. On file, NPS.
- n.d. Cultural Resource -Virgin Islands National Park and Coral Reef National Monument. On file, NPS.

This page intentionally left blank

APPENDIX A: DRAFT PROGRAMMATIC AGREEMENT

**PROGRAMMATIC AGREEMENT
BETWEEN THE
NATIONAL PARK SERVICE
AND
THE VIRGIN ISLANDS STATE HISTORIC PRESERVATION OFFICER
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 Officer (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 Officer (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/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: _____
Title: Superintendent, Virgin Islands National Park

VIRGIN ISLANDS STATE HISTORIC PRESERVATION OFFICE

By: _____ Date: _____
Title: Virgin Islands State Historic Preservation Officer

ATTACHMENTS

- A. Section 106 Steps 1 and 2 Documentation

This page intentionally left blank

APPENDIX B: ENVIRONMENTAL ISSUES AND TOPICS CONSIDERED BUT NOT RETAINED FOR DETAILED ANALYSIS

The following issues and impact topics were considered by the National Park Service (NPS) during the planning phase, but were not retained for detailed analysis for one or more of the following reasons:

- The environmental impacts associated with the issue are not central to the proposal or of critical importance.
- A detailed analysis of environmental impacts related to the issue is not necessary to make a reasoned choice between alternatives.
- The environmental impacts associated with the issue are not contentious among the public or other agencies.
- There is no potential for significant impacts to resources associated with the issue.

The rationale for dismissal is provided in the following appendix to the Caneel Bay Area Redevelopment and Management Environmental Assessment (EA).

ACOUSTIC RESOURCES AND SOUNDSCAPES

Construction activities associated with the removal or repairs of the existing damaged buildings or with any new buildings would generate sound and have temporary impacts on the Virgin Islands National Park's (VINP or "Park") natural soundscape. Under Alternative B (NPS proposed action) as described in the EA, operation and management of a resort would require use of small vehicles and equipment for grounds maintenance, guest and visitor transport, and operations. Acoustic resources at the Park include the sounds of nature, such as wildlife, waves breaking in the surf, wind and rain moving across the landscape, as well as cultural sounds. An example of cultural sounds are islander customs such as music, parades, and fireworks during holidays and Carnival (a three to four weeklong celebration in June and July). The human perception of that acoustical environment is defined as the soundscape (NPS 2010).

Sound generated from operations is not expected to result in a noticeable impact that would affect the quality of the natural soundscape or visitor experience. Under the proposed action, as more detailed design and construction plans are prepared in subsequent steps of redevelopment, mitigation measures and best management practices (BMPs) would be prescribed that would minimize impacts on the soundscape. Mitigation would include limiting times and locations when conducting construction and maintenance activities to minimize impacts on visitors and ecologically sensitive areas. Noisy tools, such as chainsaws and chippers, would be operated in a manner that minimizes impacts on the soundscape. Sound proofing of generators or other utilities also could be considered. No significant impacts are anticipated as part of the proposed action and, therefore, acoustical resources and soundscapes were not carried forward for detailed analysis in the EA.

AIR QUALITY

The Clean Air Act is the federal law that regulates air emissions from stationary and mobile sources and authorizes United States Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) for six pollutants (carbon monoxide, particulate matter, nitrogen dioxide, lead, ozone, and sulfur dioxide) to protect public health and public welfare and to regulate emissions of hazardous air pollutants. Given the United States Virgin Islands' (USVI's) remote location and small population, air quality in general is considered good. However, one concern with air quality in the USVI are the trade winds that blow millions of tons of dust from the Sahara and Sahel regions of Africa across the Atlantic Ocean. Research has found that the dust that reaches the Caribbean contains viable bacteria and fungi, nutrients, and persistent organic pollutants (NPS 2022a).

Redevelopment of the Caneel Bay area to include overnight lodging, enhanced day use opportunities, and its associated operations would result in added trips to and from the site, resulting in added air emissions from vehicles, boats and aircraft used to travel to the Caneel Bay area. On-site operations would contribute a small amount of air emissions from equipment and vehicles used to manage the property and support guest services. In addition, construction activities would create fugitive dust and vehicle emissions from construction equipment.

The impact associated with the redevelopment would be small in the context of the St. John and because the NPS would seek to minimize the footprint of ground disturbance and air emissions from construction equipment. For demolition or renovation of buildings and facilities at the site, the NPS would adhere to, or require the developer to adhere to, the stationary source standards for hazard air pollutants found in the *National Emissions Standards for Hazardous Air Pollutants*. Future operations and construction activities associated with potential redevelopment of the site would be required to comply with the USVI Air Pollution Control Act and meet the NAAQS.

As part of the redevelopment plans, the NPS would prescribe that the developer maintains sustainable operations by considering ways to lower air emissions resulting from its operation (such as the use of electric vehicles). In general, it is anticipated that air emissions would be lower than the previous operations because of the many technical advances in vehicles and equipment that generate lower emissions. The added visitors to the site and the site operations would be very small in scale regionally and is unlikely to exceed pre-hurricane visitation levels. When combined with existing air quality issues resulting from dust, there is no potential for meaningful impacts from the actions proposed in the EA. In addition, this issue is not central to the choice between alternatives. For these reasons, air quality was dismissed from detailed analysis in the EA.

ARCHEOLOGICAL RESOURCES

The Caneel Bay area contains numerous historic and archeological resources that are eligible for listing in the National Register of Historic Places (NRHP). The NPS defined the area of potential effect (APE) for this potential undertaking as the approximately 150-acre area donated by Jackson Hole Preserve, Inc. in 1983. Archeological resources dating to the preceramic archaic, Classic Taino, Danish Colonial, and twentieth century tourism periods are all present within the APE (Wild 2022a; Wild 2022b). NPS archeologists have identified and mapped several areas with especially high archeological site potential.

The lower-lying and coastal areas in the northwestern part of the APE, including Turtle Bay Beach, Hawksnest Beach North, Scott Beach, Paradise Beach, and the areas between them contain several precontact archeological sites. Additionally, there is a high potential for encountering resources related to the former Durlow Plantation and the significant events that occurred during the 1733 Insurrection of the Enslaved Community on St. John (Wild 2022a). A precontact site that likely represents an expanded boundary of the Salomon Bay site is located at Honeymoon Beach (Wild 2021). Numerous areas within the APE have high potential to contain archeological components associated with the former sugar plantation, including the village where the Black enslaved population lived, the cemetery, the industrial operation of the plantation, and the white overseer's complex (Wild 2022a). Although not identified to date, archeological resources associated with the early development of Laurance Rockefeller's resort may be present in the vicinity of the historic buildings associated with that resort.

The APE has a high potential to contain additional archeological resources that have not yet been identified. Before any ground-disturbing work would occur at the site, a systematic archeological survey would be completed to reconcile the discrepancies contained in the various agencies' files resulting from separate studies, most of which were conducted between the 1920s and 1980s (Wild 2021; Wild 2022a). The NPS has repeatedly identified damage to archeological and historic sites in the Caneel Bay area caused by unapproved activities undertaken by the operator, which were incompatible with proper resource management. These impacts include uninformed attempts at vegetation removal from and structural repair of historic structures, unpermitted archeological investigations, and construction of new amenities without federal approval or archeological testing (Kriger 2010; Wild 2021). Additionally, the impacts of hurricanes Irma and Maria, as well as the post-hurricane response, or lack thereof, may have resulted in additional adverse effects, detailed to the extent possible by NPS cultural resources professionals who have not yet been allowed full access to the property (Wild 2022b). In November 2022, the NPS obtained limited property access to conduct initial condition assessments. These additional adverse effects include a new road constructed through sites on Turtle Point with pre- and post-contact components, the ruinous state of Laurance Rockefeller-era buildings, and the overgrowth of invasive vegetation across the property (Wild 2022b).

Per the preliminary observations from the recent November 2022 condition assessments, as well as NPS remote assessment, archeological resources have been damaged in the Caneel Bay area by past activities. Lack of maintenance as well as shoreline erosion continue to impact sensitive resources, including the loss of archeological resources in the Turtle Bay area.

As part of the EA, the NPS seeks to avoid or minimize impacts to archeological resources. This process is further detailed in the draft PA provided as Appendix A to the EA. At this time, details of specific redevelopment actions are not known. Nevertheless, the NPS would review and oversee future development and operations to avoid and minimize impacts to archeological resources or vegetation removal/planting. In addition, archeological monitoring during construction would occur in areas with potential archeological resources. With the process and mitigation set forth in the PA, there is little to no potential to cause significant impact; therefore, archeological resources were not carried forward for detailed analysis in the EA. Consideration for archeological resources also is discussed in the EA.

COASTAL ZONE RESOURCES

Redevelopment has the potential to impact the resources within the coastal zone as construction activities could result in land disturbance and sedimentation, which, in turn, could affect various resources that comprise the coastal zone. Most of the Caneel Bay area falls within a Tier 1 Coastal Zone Management area and is subject to compliance with the Virgin Islands Code Annotated, Title 12 Conservation Chapter 21 Virgin Islands Coastal Zone Management, Virgin Islands Coastal Zone Management Act of 1978, and Section 307c of the Federal Coastal Zone Management Act of 1972, as amended. Therefore, redevelopment in the coastal zone would be subject to review by and approval through the issuance of a coastal zone permit and/or concurrence with the NPS Federal Consistency Determination by the Virgin Islands Department of Planning and Natural Resources (VI DPNR). One of the basic goals of the Coastal Zone Management program is “to protect, maintain, preserve and, where feasible, enhance and restore, the overall quality of the environment in the coastal zone, the natural and man-made resources therein, and the scenic and historic resources of the coastal zone for the benefit of residents of and visitors of the United States Virgin Islands” (VI DPNR 2022). Under all alternatives, the NPS would seek to avoid or minimize impacts to coastal resources, which include the seven beaches in the Caneel Bay area.

Coastal Processes and Characteristics Including Beaches

The coastal zone includes the adjacent waterbodies and their associated physical, oceanographic, weather, currents, sediments, and water quality characteristics. The redevelopment is land-based, and no in-water development activities are proposed in the plan. The NPS does not propose to construct any permanent infrastructure as part of the EA that would impact the beaches. Beaches would continue to be used by visitors for recreational purposes such as snorkeling and swimming. The NPS would not affect wind and wave events at the Caneel Bay area. For these reasons, coastal processes and characteristics were not carried forward for detailed analysis in the EA.

Water Quality

According to the *USVI Integrated Water Quality Monitoring & Assessment Report*, there are no impaired streams or other waterbodies in the context of the Clean Water Act within the immediate Caneel Bay area (VI DPNR 2020). However, water quality surrounding the Caneel Bay area is classified as impaired. Caneel Bay is categorized as Class B, Category 5, with dissolved oxygen and turbidity issues; Hawksnest Bay falls under the same category with enterococcus (lactic acid bacteria) and turbidity issues (VI DPNR 2020). Construction activities could cause a slight increase in sedimentation or turbidity in the adjacent streams or other waterbodies. However, this increase is not likely to have meaningful effects on waterbodies within the Caneel Bay area nor contribute substantially to the impaired status of Caneel and Hawksnest Bays. In addition, BMPs would be employed to minimize runoff into waterbodies during construction, to the extent possible. For these reasons, water quality was not carried forward for detailed analysis in the EA.

Coral Reef and Seagrass Beds

There are seven species of reef-building corals listed by the National Oceanic and Atmospheric Association National Marine Fisheries Service as threatened in the Caribbean Sea: elkhorn coral (*Acropora palmata*), staghorn coral (*Acropora cervicornis*), pillar coral (*Dendrogyra cylindrus*), lobed star coral (*Orbicella annularis*), mountainous star coral (*Orbicella faveolata*), boulder star coral (*Orbicella franksi*) and rough cactus coral (*Mycetophyllia ferox*). All seven of these species are known to occur on reefs monitored within VINP (NPS 2020; Rogers and Garrison 2001). Threats to these species include bleaching from warming water temperatures, coral diseases (Stony Coral Tissues Loss Disease), intense storm events, ocean acidification, damage from vessels and anchors, overfishing, nutrient enrichment, sediment runoff, contaminants, and damage from tourist activities. Seagrasses are true flowering plants that live underwater. Typical species include turtle grass (*Thalassia testudinum*), manatee grass (*Syringodium filiforme*) and shoal grass (*Halodule wrightii*). Communities of seagrass beds consist of various seagrass and algae species and serve as nursery areas and support vertebrate and invertebrate life. Seagrasses are important bottom habitats at the Park because they are highly productive and have important interactions with coral reefs. Boat anchors (mainly anchor chain drag) and propellers cause damage to seagrass beds that undermine the surrounding root systems, and it may take years for these areas to recover.

No in-water work would be proposed as a part of the EA. Terrestrial redevelopment activities could result in impacts to coastal resources, including seagrass beds and coral reef habitat, via indirect impacts to water quality caused by erosion and sedimentation from construction activities. However, these impacts would be mitigated through the use of the appropriate erosion control measures to ensure no construction debris nor materials entered nearby waterbodies or impacted water quality. Therefore, impacts to water quality and resulting impacts to coral reefs and seagrass beds from site development in upland areas are not anticipated.

Coral reefs and seagrass beds may be impacted by the increased presence of humans and watercrafts in the Caneel Bay area. Many chemicals found in sunscreens can have major adverse impacts on corals, algae and the ecosystem. Research shows that high concentrations of chemicals found in chemical-based sunscreens, such as oxybenzone and avobenzone, have been found in the waters surrounding coral reefs as a result of sunscreen washing off swimmers (Downs 2015). These chemicals can harm coral health, reproduction and potentially contribute to the decline of coral reefs in areas of high levels of recreational use. A USVI law signed on June 25, 2019, prohibits the sale, use, and possession of sunscreens with those harmful chemicals. However, some visitors still bring and use them. Another impact to coral and sea grasses results from visitor use (wading, swimming, snorkeling, or water sports) whereby the users trample the seagrass or come in contact with the coral.

Since 2017, there has been minimal land access to the beaches within the area, except for Honeymoon Beach. However, swimmers, snorkelers, and divers are currently able to access the coral reefs around the Caneel Bay area by boat. As a result of the proposed plan, it also is possible that a chartered boat could bring overnight guests to and from St. Thomas to the existing pier in Caneel Bay. However, anchoring, including for moored boats, is not permitted in the shallow waters within the Caneel Bay area (including Honeymoon Beach, Caneel Bay, Scott Bay, Turtle Bay, and Hawksnest Bay) to protect seagrass and coral reef habitat. As such, it is unlikely that actions proposed in the EA would increase boat traffic to a degree that would impact seagrass via accidental scarring beyond what may be currently occurring.

For these reasons, impacts to coral reefs and seagrass from the increased level of human interaction would not have meaningful effects and this issue was not carried forward for detailed analysis in the EA.

Marine Wildlife Including Protected Species and Their Habitat

Essential Fish Habitat. Essential fish habitat (EFH), designated by the Magnuson Stevens Fishery Conservation and Management Act, is present in the nearshore waters of Caneel Bay. No in-water work is proposed under Alternative A or B as described in the EA. However, indirect impacts could occur from construction activities or preservation work resulting in runoff causing erosion and subsequent siltation. This siltation could impact EFH. Future development would comply with VI DPNR stormwater management and erosion and sediment control requirements that would minimize siltation. Since impacts to EFH are not anticipated or would be minimized through silt and erosion control measures, this topic was not carried forward for detailed analysis in the EA.

Fishes. The giant manta ray (*Manta birostris*), Nassau grouper (*Epinephelus striatus*), oceanic whitetip shark (*Carcharhinus longimanus*), and scalloped hammerhead shark (*Sphyrna lewini*) are federally listed species known to inhabit the waters of the USVI, although rare to quite rare in the waters of the park. Because no in-water work is proposed under this planning effort, and because any barge or ship bringing construction work through park waters would have a professional licensed captain thus reducing the possibility of grounding on seabeds or collisions with sea life, the NPS does not anticipate adverse effects to these species.

Sea Turtles. Three sea turtle species exist within the coastal waters and beaches of St. John: hawksbill sea turtles (*Eretmochelys imbricata*), green sea turtles (*Chelonia mydas*), and leatherback sea turtles (*Dermochelys coriacea*). Loggerhead sea turtles (*Caretta caretta*) are also known to exist in the waters of the USVI, although they are rarely seen in park waters and have not been documented nesting on park beaches. Hawksbill and green turtles are common within the Caneel Bay area, while leatherback turtles are rarely seen; however, all three species have the potential to nest on the Caneel Bay area beaches (NPS 2022b). From 2016 to 2022, the Park's Turtle Program has patrolled the beaches of Little Caneel, Caneel, Paradise, Scott, Turtle, and Hawksnest North for the presence of sea turtle nests, and a total of 13 nests for all the beaches have been identified (NPS 2021 and pers. comm. Adren Anderson 2023). In 2020, four confirmed sea turtle nests were recorded in the Caneel Bay area, located specifically in Turtle Bay (VINP 2020).

Redevelopment activities would introduce temporary disturbance resulting from repairing existing facilities, removal of buildings, such as the damaged cottages along Scott Beach and Caneel Beach, and construction of replacement buildings in more resilient areas. No in-water seafloor disturbing activities are proposed under either of the alternatives.

Construction would be limited to daytime activities and a lighting plan for Caneel Bay would be prepared to include the use of "sea turtle safe lighting" such as lights of a very specific red wavelength and carefully shielded as to not cast light toward nesting areas (Sea Turtle Conservancy 2022). No beach disturbance is anticipated under either of the alternatives, and buffers would be put in place to ensure no debris or construction-related activity disturbs the beaches of the Caneel Bay area. Contractor staff would be trained prior to beginning construction in the identification of sea turtles and their nesting activity. In the event a sea turtle or sea turtle nest is discovered during construction activities, work

would immediately cease, and the NPS would determine the best course of action depending on the scenario in coordination with resources agencies, as appropriate. Furthermore, if any recorded sea turtle nests are discovered in construction work areas, a buffer (to be determined through consultation with the US Fish and Wildlife Service [USFWS]) would be placed around the nest to minimize disturbance impacts.

The reopening of the beaches of the Caneel Bay area under the proposed action could impact nesting sea turtles through increased pedestrian traffic. Reestablishment of the overnight lodging under the proposed action would increase visitor use around the beaches during the day and night. The majority of this traffic is anticipated to be in daytime hours, which is outside of key nesting hours. With NPS oversight of the Caneel Bay area, sea turtle monitoring and protection would continue. Currently, the VINP Sea Turtle Monitoring and Protection Program includes programs for nest protection, volunteer beach monitoring research, and education outreach. Each year, as trends in sea turtle nesting change, the VINP Program adapts and changes monitoring accordingly.

No in-water work is proposed under this planning effort, and any barge or ship bringing construction work through park waters would have a professional licensed captain thus reducing the possibility of grounding on seagrass or corals, or collisions with sea turtles.

Due to the small number of sea turtle nests at the Caneel Bay area beaches and the use of mitigation measures to lessen impacts by requiring daytime construction work, the use of professional licensed captains for barges, the use of an approved lighting plan, buffers around turtles and known nests, and monitoring and educational efforts, impacts on sea turtles are not considered significant and do not rise to the level of being central to the proposal. For these reasons, sea turtles were not carried forward for detailed analysis in the EA.

Terrestrial Wildlife Including Protected Species and Their Habitats

The EA has the potential to impact terrestrial wildlife such as mammals and birds, including protected species and their habitats. Other terrestrial species exist in the Caneel Bay area including larger mammals, such as deer and donkeys, which are not native to St. John. These impacts would occur from construction-related disturbances, maintenance of the grounds, and human activities related to recreational use of the beaches and grounds.

Sperm Whale. The Puerto Rico and U.S. Virgin Islands population of sperm whales (*Physeter macrocephalus*) is quite small and isolated, and have not been recorded within the nearshore waters of Caneel Bay. No in-water work is proposed under this planning effort, and any barge or ship bringing construction work through park waters would have a professional licensed captain thus reducing the possibility of collisions with any sea life. Therefore, sperm whales were not carried forward for detailed analysis in the environmental assessment.

Bats. The only terrestrial mammals native to St. John are bats. The territorially endangered red fruit bat (*Stenoderma rufum*) is known to occur in higher elevation areas near Bordeaux Mountain and the southern side of St. John near Little Lameshur Bay (Smithsonian Encyclopedia of Life 2022). It is possible that some bat species occupy the currently abandoned buildings at the Caneel Bay area and may be disturbed by any activity that removes, rebuilds, or rehabilitates the buildings for use. It is

assumed that these bat species would vacate the area under construction and would most likely find roosting elsewhere. Bat species that roost in the flora at the Caneel Bay area may be temporarily displaced during any construction activity, but roosting habitat would remain available in other areas of the Caneel Bay area as well as a multitude of locations on St. John.

A detailed analysis of environmental impacts on bats is not necessary to make a reasoned choice between alternatives; and impacts are not significant, because sufficient roosting and foraging habitat exists outside of the roughly 150-acre resort area. Furthermore, surveys for bats could occur prior to construction and exclusion devices could be used to prevent bats from accessing known roosts during construction. This would lead to temporary impacts during construction, but would prevent permanent impacts, including injury to any individuals. Therefore, since no significant impacts to any bat species are anticipated as part of the proposed plan, these species were not carried forward for detailed analysis in the EA.

Birds. Two bird species, piping plover (*Charadrius melodus*) and roseate tern (*Sterna dougallii dougallii*), are federally listed as threatened and are known to occur on St. John but have not been documented at the Caneel Bay area. There are also three territorially endangered species, bridled quail-dove (*Geotrygon mystacea*), black-crowned night heron (*Nycticorax nycticorax*), and great egret (*Ardea alba*) that have been observed in the Caneel Bay area in the past (NPS 2013).

Piping Plover — The piping plover is a small shorebird that utilizes coastal habitat for feeding and nesting. This species is known to winter in warmer tropical areas from July through February. Direct impacts to coastal shoreline habitat are not proposed, but the placement of buildings at Cottage Point or rehabilitation of existing features adjacent to coastal shoreline or beaches may lead to temporary avoidance of these areas. However, additional habitat exists nearby and at other locations on the island, and no impacts are anticipated. The re-opening of the beaches in the Caneel Bay area under the proposed action could impact foraging and loafing piping plovers through increased pedestrian traffic. Reestablishment of the overnight lodging under the proposed action would increase visitor use around the beaches during the day and night. Although beach visitation to some Caneel Bay beaches has been lower since the resort ceased operation as a hotel following the 2017 storms, the cap of the 166 guest rooms would likely cap human presence on these beaches to pre-storm levels. Therefore, this species was not carried forward for detailed analysis in the EA.

Roseate Tern — The roseate tern is a medium-sized seabird that inhabits rocky offshore islands. It feeds exclusively on small fish by diving into the water or stealing food from other birds. While no terns were observed during surveys in February 2022, terns typically migrate to wintering grounds in late September or October (USFWS 2011). Furthermore, terns are known to nest on cays (small islands without fresh water sources) directly off the Caneel Bay area shoreline. None of the alternatives proposed include any work on offshore cays; therefore, no impacts are anticipated, and this species was not carried forward for detailed analysis in the EA.

Bridled Quail-Dove — The bridled quail-dove is a medium-sized dove with a distinctive white stripe beneath each eye. This ground dwelling species is primarily found in forested areas where it forages in leaf-litter (Boal 2011). Although this species is common within the Caneel Bay area, no new development in undisturbed areas is proposed. Clearing of overgrown vegetation during construction may cause temporary avoidance impacts, but no meaningful impacts are anticipated. Furthermore, a

detailed analysis is not necessary to make a reasoned choice between alternatives. Therefore, this species was not carried forward for detailed analysis in the EA.

Black-crowned Night Heron — The black-crowned night heron is a small heron that inhabits marsh wetlands throughout North America and the West Indies. This species is common in some portions of its range but is listed as territorially endangered in the USVI due to habitat loss and human disturbance (VI DPNR 2007). This species is known to occur within the Caneel Bay area, but only temporary avoidance impacts during development are anticipated and no additional development of undisturbed habitat is proposed. Therefore, no meaningful impacts to this species are anticipated. Furthermore, a detailed analysis is not necessary to make a reasoned choice between alternatives. Therefore, this species was not carried forward for detailed analysis in the EA.

Great Egret — The great egret is a medium-sized wading bird that inhabits freshwater, estuarine, and marine wetland areas. This species breeds and winters in the USVI. Although widespread in North America, the great egret is listed as territorially endangered in the USVI due to loss of habitat and human disturbance (VI DPNR 2007). Although the great egret is known to occur within the Caneel Bay area, only temporary avoidance impacts during development are anticipated and no additional development of undisturbed habitat is proposed. Therefore, no meaningful impacts to this species are anticipated. Furthermore, a detailed analysis is not necessary to make a reasoned choice between alternatives. Therefore, this species was not carried forward for detailed analysis in the EA.

ENVIRONMENTAL JUSTICE

Executive Order (EO) 12898, issued in February 1994, directed federal agencies to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations” (CEQ 1997). The EO particularly emphasizes the importance of the public participation process, and agencies were directed to “identify potential effects and mitigation measures in consultation with affected communities, and improve the accessibility of meetings, crucial documents, and notices.” NPS’s efforts to reach the public inclusive of low income and minority populations are described in Chapter 5. These actions include but are not limited to conducting public outreach at local churches and making NPS staff available at the VINP visitor center to explain the planning efforts, answer questions, and help input comments. On January 27, 2021, President Joseph R. Biden Jr. issued EO 14008, which reaffirmed the importance of environmental justice and instructed agencies to “make achieving environmental justice part of their missions by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related and other cumulative impacts on disadvantaged communities, as well as the accompanying economic challenges of such impacts.”

In accordance with EOs 12989 and 14008, an environmental justice review was conducted to determine if a disproportionate number of minority and low-income persons would be affected by any of the alternatives. The USEPA’s Environmental Justice Screening and Mapping Tool (Version 2.0) does not have any data for the USVI, using a 10-mile radius from the resort. The Explore Reports feature on the mapping tool states, “[t]he area is too small or sparsely populated to generate an EJScreen chart” (USEPA 2016). Currently available census data indicates that more than 80% of people who live near the

Caneel Bay area are non-white. Based on the US Department of Health and Human Services Health Resources and Services Administration (HRSA) Maternal and Child Health website's *Overview of the State – Virgin Islands – 2022*, the USVI population is multi-ethnic and multiracial, and of the population, 77% is black, 10.5% white, 12.5% other races, and 17% of the population identify as Hispanic origin. A high percentage of low-income populations also are known to reside on St. John, and a 2014 Virgin Islands Community Survey report stated that 18.4% of families in the USVI were living below the poverty level (HRSA 2022).

At this time, the NPS has not identified any adverse impacts to low income or minority populations resulting from the EA. It would be highly unlikely that the actions taken by the NPS would introduce materials into the environment that would have indirect adverse health impacts or would negatively impact the economic conditions of low-income populations near the Caneel Bay area. The proposed action would have a greater economic benefit than existing conditions by increasing opportunities for employment and opportunities for local businesses through increased visitation to St. John and partnerships with the Caneel Bay area commercial service providers. As discussed in the socioeconomic section of the EA, the redevelopment of the Caneel Bay area would create a meaningful number of construction jobs, along with opportunities for ancillary trade and wholesale businesses in the USVI. Furthermore, additional jobs would be generated to support operation and management of the site. For instance, hospitality related jobs would be opened to operate the overnight lodging, restaurant(s) or other visitor services provided at the site. The lodging also would generate the need for additional transportation to and from Caneel Bay, as well as support local vendors and businesses to maintain operations. The redevelopment could increase visitation to the Park and could result in visitors extending their stay at the Park. When combined with the local spending by staff employed at the Caneel Bay area, the redevelopment would contribute to the local economy and increase employment levels on St. John and St. Thomas. Construction-related impacts from noise and air emissions would be short-term and temporary.

Therefore, based on EOs 12989 and 14008, as well as USEPA and NPS guidance, environmental justice was dismissed as an impact topic requiring detailed analysis. However, in view of the past inequalities at the resort related to limited access and more recent increases in unemployment and inflation on St. John, NPS will continue to consider environmental justice concerns following this initial phase of the planning efforts. Furthermore, NPS will seek input from community members during additional outreach efforts associated with site development that may be required to address the needs of those who may be affected by environmental justice concerns.

ETHNOGRAPHIC RESOURCES

New construction, maintenance associated with redevelopment, and operational activities could affect certain features or change landscapes that are of traditional significance, such as ceremonial sites, colonial-era plantations sites of enslavement, and natural resources, such as heritage trees and Tamarind trees. These large, older trees are locally known as “Grandfather Trees.” In a national park context, ethnographic resources are the cultural and natural features of a park that are of traditional significance to traditionally associated peoples. These peoples are the contemporary park neighbors and ethnic or occupational communities that have been associated with a park for two or more generations (40 years) and whose interests in the park’s resources began before the park’s establishment. Living

peoples of many cultural backgrounds may have a traditional association with a particular park. Traditionally associated peoples generally differ as a group from other park visitors in that they typically assign significance to ethnographic resources—places closely linked with their own sense of purpose, existence as a community, and development as ethnically distinctive peoples. These places may be in urban or rural parks and support ceremonial activities or represent birthplaces of significant individuals, group origin sites, migration routes, or harvesting or collecting places. Although these places have historic attributes that are of great importance to the group, the attributes themselves may not necessarily have a direct association with the reason the park was established or be appropriate as a topic of public interest.

VINP has no formal ethnographic determinations but recognizes the unique role that the Caneel Bay area plays in the community, and the ties the area has to impactful historical events from the colonial and post-colonial emancipation eras. Although not thoroughly documented, the Park possesses resources that could potentially be of value to traditionally associated people, such as the off-island descendants of the Taino, Carib, Kalinago, or other Caribbean indigenous groups, and the on-island descendants of Maroon communities. These resources include pre-contact ceremonial sites, colonial-era plantation sites of enslavement, and natural resources, such as heritage trees and Tamarind trees.

There are various landscapes, places, and natural resources at Caneel Bay that have cultural significance to St. Johnians, including descendants of the Maroon communities and other peoples, such as those affiliated with the Taino culture. Potential ethnographic resources may include landscapes associated with enslavement and the Plantation economy; places associated with the Enslaved Peoples Revolt of 1733, its suppression, and commemoration; and natural resources with cultural value, such as Tamarind trees, which may serve as markers of archeological and ceremonial sites and may have contributed to mortuary practices. Examples of the deep relationship the local community has with the Caneel Bay area include the many generational experiences of service and sense of pride from local St. Johnians employed at the resort. Furthermore, ceremonial sites associated with the Taino culture have been documented in the Park and are thought to exist in the Caneel Bay area.

NPS Management Policy 5.3.5.3, *Ethnographic Resources*, states that the NPS is responsible for identifying ethnographic resources and considering the effects that NPS actions may have on them. Research gaps surrounding ethnographic resources and traditionally associated groups highlight the importance of community engagement to determine if these resources are ethnographic and, if so, to better understand how they might be affected by the development proposal. As mitigation, following this planning process and before subsequent site design, NPS would conduct an ethnographic study to better understand the resources and their locations on the Caneel Bay peninsula. This study would be used to help inform future redevelopment. Although important, the NPS does not anticipate the proposed action having the potential to significantly impact ethnographic resources. In addition, the NPS proposes increasing access to the Caneel Bay area and providing interpretation of the history and traditional uses of the property, which would be a long-term benefit. Therefore, ethnographic resources were not carried forward for detailed analysis in the EA.

HUMAN HEALTH AND SAFETY

The current state of the buildings and facilities at the resort that were damaged as part of the 2017 hurricanes potentially pose a safety concern such as unstable structures and debris from the buildings. 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 all alternatives, the NPS would identify a management approach (such as stabilization or removal of buildings) to address unsafe conditions and restore public access.

Prior to the redevelopment activities and the affected area being opened for public use, the following actions would 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. Throughout the resort property, loose building materials that test positive for asbestos containing material will be removed from the site (properly bagged and disposed of off-island at a landfill certified to receive asbestos containing materials (ACM)). Loose building material generally refers to hurricane debris (primarily roofing), but also includes individual, non-buried, pipe sections that contain ACM, and various other loose building materials. ‘Loose’ describes materials no longer attached to a building or buried pipe network.

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. The NPS determined that other parts of the Caneel Bay area, including the wastewater treatment plant and catchment basin areas, do not require cleanup actions.

In all cleanup actions, 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.

Overall, redevelopment of the Caneel Bay area would have a beneficial effect to human health and safety from the stabilization and/removal of unsafe structures. Under all alternatives, the NPS would have more oversight and inspection of the Caneel Bay area site operations, thereby reducing future risk of site contamination from the site’s operations. Therefore, issues related to human health and safety were not carried forward for detailed analysis in the EA.

VEGETATION

During construction and redevelopment activities, certain actions – including clearing of overgrown vegetation, pruning of vegetation to repair or replace existing infrastructure, and clearing of areas for potential new facilities – would impact vegetation. The impacts are expected to be minimal as the NPS would prescribe that the developer use the existing building footprint to the extent practicable. Once detailed plans were developed, natural resource surveys would be conducted prior to any clearing and removal, and BMPs would be prescribed to minimize impacts to vegetation.

As part of the proposed action, there would be areas with maintained landscapes within the resort area and designated natural areas (the conservation zone). Within the conservation zone, vegetation would

be restored to a more natural state. Potential benefits of this activity would include reducing soil erosion, providing additional habitat for wildlife, and improving vegetation buffers for water quality. In addition, impacts to vegetation in the context of the larger Park setting are not likely to be significant; therefore, vegetation was not carried forward for detailed analysis in the EA.

Terrestrial Vegetation Including Protected Species and Their Habitat

Redevelopment and future operations of the Caneel Bay area have the potential to impact protected terrestrial plant species and their habitat from construction-related disturbance and maintenance of the grounds. If avoidance buffers are not feasible, the NPS would re-initiate consultation with the USFWS to determine if relocation or additional minimization measures should be incorporated into the proposed action. The following plant species, federally listed under the Endangered Species Act, are known to occur on St. John: St. Thomas lidflower (*Calyptranthes thomasiana*), St. Thomas prickly-ash (*Zanthoxylum thomasianum*), and marron bacora (*Solanum conocarpum*). However, none of these federally endangered species are known to occur within any areas proposed for redevelopment (NPS 2013) and were not observed during a November 2022 condition survey for federally listed plant species within the Caneel Bay area; as such, no interactions with or adverse effects to these species are anticipated. Furthermore, the developed areas would be surveyed for these species prior to development. If any species are observed, construction buffers for avoidance would be implemented to the degree possible. If avoidance buffers are not feasible, species would be relocated prior to construction to prevent unavoidable impacts. Therefore, since no impacts are anticipated, these species were dismissed from detailed analysis in the EA.

The following plant species listed by the VI DPNR were observed during vegetation assessments in 2013: Woolly nipple cactus (*Mammillaria nivosa*), Jost van Dyke's Indian mallow (*Bastardiopsis [Sida] eggersii*), and Lignum vitae (*Guaiacum officinale*). Other native terrestrial vegetation, such as sea grape (*Coccoloba uvifera*), Tyre palm (*Coccothrinax alta*), and heritage trees, also occur within the Caneel Bay area. The woolly nipple cactus and Jost van Dyke's Indian mallow were previously planted at the resort and still persisted on site at the time of the survey in 2013 (NPS 2013). Although nearly extinct in the USVI, Lignum vitae is commonly found in the Caneel Bay area (NPS 2013). During a condition survey conducted by the NPS in November 2022, several listed species that were formerly cultivated on the resort property were not found. These were Eggers' tree mallow (*Bastardiopsis eggersiana*), Eggers' cockspur (*Erythrina eggersii*), Woolly nipple cactus, and Butterfly orchid (*Psychillis macconnellii*). However, the following species were found during the November 2022 survey: Christmas orchid (*Epidendrum ciliare*) in one location; Lignum vitae in numerous locations but are considered probably not from genetically Virgin Islands seed stock; cobana nigra (*Libidibia [Stahlia] monosperma*) in one location; Puerto Rican royal palm (*Roystonea borinquena*) in two locations, known to be from non-Virgin islands seeds; and Puerto Rican hat palm (*Sabal causiarum*) in one location, thought to be from Puerto Rican seed stock. Both Eggers' cockspur (potentially the world's largest known population) and Butterfly orchid were observed on Hawksnest Point, in the area transferred to the VINP in 1983 and not under the RUE.

Potential impacts to these terrestrial vegetation species would depend upon the degree of maintenance and vegetation clearing that would be required. The site would be surveyed for these species prior to construction, with special attention to the listed species, and an avoidance buffer for construction activities would be implemented should any listed species be observed. If avoidance buffers would not

be feasible, the NPS would re-initiate consultation with the USFWS to determine if relocation or additional minimization measures should be incorporated into the proposed action. Therefore, no significant impacts are anticipated as part of this plan and these species were not carried forward for detailed analysis in the EA.

Certain threatened species and the species listed above, such as *Lignum vitae*, are cultivated or grown commercially and could be used for landscaping (Bárrios et al. 2017). In general, new exotic species would not be introduced at Caneel Bay for landscaping purposes. Available native species would be used to fulfill the Park management objectives. Should any exotic species be proposed, they would be managed so they would not spread or become a pest on Park or adjacent lands in accordance with NPS Management Policy 4.4.4.1, *Introduction or Maintenance of Exotic Species*.

VIEWSHEDS AND DARK NIGHT SKIES

The introduction of new structures and lighting associated with redevelopment activities could have an impact on viewsheds and dark night skies. Given the relatively undeveloped nature of St. John and its surrounding waters and islands, the scenic quality of the Park's viewsheds and its dark night skies are identified as fundamental resources and values that contribute to the Park's purpose. The proposed action could result in the rehabilitation and/or new installation of structures and artificial lighting that would be partially visible along shorelines in the Caneel Bay area and ridgelines above the area. The NPS would require future site development to reduce the visual impacts to the site by prescribing that any new development use downward facing lighting, use the existing footprint of most structures on the site, only elevate structures to additional stories when necessary for storm surge and flood resiliency, and use materials or exterior paint colors that blend into the environment. As discussed previously, the NPS would also require any new development to use sea turtle safe lighting to reduce the effects of lights. With this mitigation, the proposed redevelopment is unlikely to adversely affect the viewsheds and dark night skies. Therefore, viewsheds and dark night skies were not carried forward for detailed analysis in the EA.

WETLANDS

During a recent condition assessment conducted by the NPS in November of 2022, two wetlands were identified. One wetland was identified in the former lawn area between ZoZo's Restaurant and the Sugar Mill ruins, and another wetland was identified on the isthmus between Scott Beach and Hawksnest Beach. These resources were not formally surveyed/delineated. Based on historic imagery and records from the original resort development, these individual wetland areas were originally salt pond/mangrove basins, which were filled and converted to open lawn/pasture during the construction of resort. This original fill predated the Clean Water Act. These areas have since begun reverting to wetlands and would be subject to the Clean Water Act and *Director Orders 77-1: Wetland Protection* jurisdictions. No other wetlands are known to exist in the study area. Any ground disturbance in these areas may require permitting under Section 404 of the Clean Water Act, including a formal wetland delineation prior to permit submittal. The NPS would seek to avoid impacts to wetlands from redevelopment activities and, therefore, wetlands were not carried forward for further detailed analysis in the EA.

REFERENCES

Bárrios, Sara, Natasha Harrigan, Nancy Pascoe, Keith Grant, Marcella Corcoran, Tom Heller, Rosemary Newton, Michele Sanchez, Colin Clubbe and Martin Hamilton (Bárrios et al.)

- 2017 "Conserving the Threatened Plants of the British Virgin Islands (BVI)." *BGjournal*, Vol. 14, No. 1, Red Lists: Plant Conservation Assessments and the Role of Botanic Gardens (January 2017), pp. 27-29. Available Online: <https://www.jstor.org/stable/10.2307/26369175>. Accessed April 1, 2022.

Boal, C.W.

- 2011 Bridled Quail Dove (*Geotrygon mstacea*), version 1.0. *Neotropical Birds Online* (T.S. Schulenberg, Editor) Cornell Lab of Ornithology, Ithaca, NY, USA. Available Online: <https://doi.org/10.2173/nb.brqdov1.01>. Accessed March 21, 2022.

Downs, C.A.

- 2015 Toxicopathological Effects of the Sunscreen UV Filter, Oxybenzone (Benzophenone-3), on Coral Planulae and Cultured Primary Cells and Its Environmental Contamination in Hawaii and the US Virgin Islands. Available Online: <https://doi.org/10.1007/s00244-015-0227-7>. Accessed August 30, 2022.

Krigger, Sean L.

- 2010 Memorandum: Unauthorized Archaeological Excavation, Testing, and Excavation on Caneel Bay Resort. Memorandum dated June 24, 2010, to Lorna A.C. Thomas, Director. On file, NPS.

National Park Service (NPS)

- 2010 Acoustical Toolbox: Recommendations for Reducing Noise Impacts in National Parks. Available Online: <https://home.nps.gov/subjects/sound/upload/AcousticalToolbox-508-2.pdf>. Accessed March 28, 2022.
- 2013 Environmental Assessment for the Caneel Bay Resort Lease. Available Online: <https://newsofstjohn.com/wp-content/uploads/2019/06/Caneel-Bay-2013-Environmental-Assessment-.pdf>. Accessed March 18, 2022.
- 2020 Marine Benthic Communities: Coral Reef Monitoring in Virgin Islands National Park 2020. Available Online: <https://irma.nps.gov/DataStore/DownloadFile/658710>. Accessed March 22, 2022.
- 2021 VINP Sea Turtle Program Monitoring Efforts and Nesting Activities at Caneel Bay, 2016-2021.

2022a VINP Air Quality. Available Online: <https://www.nps.gov/viis/learn/nature/airquality.htm>. Accessed March 18, 2022.

2022b Turtles of the Virgin Islands. Available Online: <https://www.nps.gov/viis/learn/nature/turtles-of-the-virgin-islands.htm>. Accessed March 18, 2022.

NOAA Fisheries

2010 SPERM WHALE (*Physeter macrocephalus*): Puerto Rico and U.S. Virgin Islands Stock (noaa.gov). Available Online: https://media.fisheries.noaa.gov/dam-migration/spermwhale2010_pr_usvi_508.pdf

Rogers, C. and Garrison, V.

2001 Ten Years after the Crime: Lasting Effects of Damage from a Cruise Ship Anchor on a Coral Reef in St. John, US Virgin Islands. *Bulletin of Marine Science*. 69. 793-803.

Sea Turtle Conservancy

2022 Beachfront Lighting: Turtle Friendly Lighting Examples. Available Online: <https://conserveturtles.org/beachfront-lighting-turtle-friendly-fixtures-lights/?msclkid=69a1c140ac5011ecab56a9858fff5d2d>. Accessed March 28, 2022.

Smithsonian Encyclopedia of Life

2022 Red Fruit Bat. Available Online: <https://eol.org/pages/327945>. Accessed March 18, 2022.

US Department of Health and Human Services Health Resources and Services Administration (HRSA)

2022 Overview of the State – Virgin Islands – 2022. Available Online: <https://mchb.tvisdata.hrsa.gov/Narratives/Overview/08168cd7-93ba-451f-a8fb-1eaceff46825>. Accessed March 28, 2022.

US Environmental Protection Agency (USEPA)

2016 EPA's Environmental Justice Screening and Mapping Tool (Version 2.0). Available Online: <https://ejscreen.epa.gov/mapper/>. Accessed March 27, 2022.

US Fish and Wildlife Service (USFWS)

2011 Roseate Tern Fact Sheet. Available Online: <https://www.fws.gov/southeast/pdf/fact-sheet/roseate-tern-english.pdf>. Accessed March 21, 2022.

Virgin Islands Department of Planning and Natural Resources (VI DPNR)

- 2007 Endangered Species of the US Virgin Islands. Available Online: https://ufdcimages.uflib.ufl.edu/CA/01/30/09/51/00001/http__www.vifishandwildlife.com_Education_AquaticEd_Coloringbook_EndSpColorBook_UsedFiles_ESColorBook.pdf. Accessed March 21, 2022.
- 2020 USVI Integrated Water Quality Monitoring & Assessment Report. Department of Planning & Natural Resources Division of Environmental Protection Water Quality Management Program. Available Online: <https://dpnr.vi.gov/wp-content/uploads/2021/03/2020-USVI-Integrated-Report-FINAL.pdf>. Accessed April 5, 2022.
- 2022 Virgin Islands Code Annotated Title 12. Conservation Chapter 21. Virgin Islands Coastal Zone Management. Available Online: <https://dpnr.vi.gov/czm/czmrulesandregs/>. Accessed March 22, 2022.

Wild, Ken

- 2021 Summary of Projects Concerning Cultural Resources at Caneel Bay. On file, NPS.
- 2022a VIIS Caneel Bay Area Redevelopment and Management Plan (PEPC 101399) Cultural Resources. Draft on file, NPS.
- 2022b Summary of on-going adverse impacts to cultural resources at Caneel Bay Resort. On file, NPS.

This page intentionally left blank

APPENDIX C: ADDITIONAL INFORMATION REGARDING COMMUNITY ENGAGEMENT WITH THE ENVIRONMENTAL INVESTIGATION AT CANEEL BAY 2021-2022

The National Park Service (NPS) coordinated a project concerning contamination in specific locations of the Caneel Bay area parallel to the Caneel Bay Area Redevelopment and Management Environmental Assessment (EA). Civic engagement was an important part of the effort to investigate the contamination and evaluate removal action alternatives to address threats to human health or welfare or the environment. The initial investigation began in 2012 yet coincided with the post-2017 hurricanes redevelopment effort. As noted in the EA, the environmental investigation, formally known as the Engineering Evaluation and Cost Analysis (EE/CA), is a key antecedent to the EA. To keep the public informed of its progress, the NPS launched a series of information notices, publicly available materials, and public meetings to inform and engage the public on the study results. Public comments were a valuable contribution to the process and helped shape a portion of the Action Memoranda, the official decision documents which identify cleanup actions to address threats to human health or welfare or the environment from potential exposure to hazardous substances. The following civic engagement activities associated with the Caneel Bay EE/CA coincided in timing with the broader EA:

- During Spring 2021, NPS conducted community interviews with local public officials, former NPS staff who remain St. John residents, former Caneel Bay staff, representatives for local organizational and interest groups and other affected parties.
- In July 2021, an EE/CA Notice of Availability and Notice of Public Meetings was posted for three days in the Virgin Islands Daily News and the St. John Source.
- In September 2022, an EE/CA Addendum Notice of Availability and Notice of Public Meetings was posted for five days in the Virgin Islands Daily News, St. John Source, and the Virgin Islands Consortium.
- Community Update factsheets were issued in Spring 2021 and Fall 2022.
- June 10, 2021, NPS hosted a virtual Community Learning Session to share the EE/CA results.
- June 24, 2021, NPS hosted a virtual Listening Session to hear comments from the public on the EE/CA.
- September 14, 2022, NPS hosted a Community Learning Session, virtual and in-person, to share the EE/CA Addendum results.
- September 27, 2022, NPS hosted a listening session, virtually and in-person, to hear comments from the public on the EE/CA Addendum.
- A printed copy of the Administrative Record was made available on St. John and St. Thomas for viewing every weekday during business hours during and after the comment periods.

This page intentionally left blank

This page intentionally left blank



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under US administration.

US Department of the Interior – National Park Service