

National Park Service
US Department of the Interior



Caneel Bay Redevelopment and Management Plan
Virgin Islands National Park

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Civic Engagement Comment Summary Report

May 2022

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Introduction: What is 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, of the National Park Service (NPS). It strengthens public understanding of the full meaning and contemporary relevance of these resources. The foundation of civic engagement is a commitment to building and sustaining relationships with neighbors and communities of interest.

In April 2021, the NPS met with the community at large to discuss the future of the Caneel Bay area at Virgin Islands National Park (Park). The NPS closely reviewed and discussed all comments submitted and transcripts from our April 2021 listening sessions. In the fall of 2021, the NPS assembled an interdisciplinary team of staff from the Park, regional office, and other NPS offices to begin planning for the future of the Caneel Bay area. These team members have expertise in sustainable development, community planning, commercial services, and cultural resources management, among other disciplines. Together, this interdisciplinary team, using input from the April 2021 public comment period, developed a preliminary range of options for the redevelopment of the Caneel Bay area, as well as a draft purpose and need statement and preliminary environmental issues.

The NPS continued its civic engagement outreach activities in January, February and March 2022. This report presents the analysis and summary of public comments received during the 2022 civic engagement public comment period for the redevelopment and management of the Caneel Bay area. It provides a summary of the concerns expressed during the public comment period. Public comments obtained from this process were gathered, organized, and analyzed using the NPS Planning, Environment, and Public Comment (PEPC) web-based tool. The information obtained during this comment period will be used to assess and refine the preliminary alternatives, refine environmental issues, and ensure the NPS has the information needed to move forward with the National Environmental Policy Act (NEPA) process. The next step in the process is to develop an Environmental Assessment (EA), which will include additional public outreach to share information and provide opportunities for public comment.

Civic Engagement Outreach

The NPS held a public comment period for the Caneel Bay Redevelopment and Management Plan from January 18, 2022 to March 4, 2022 (a 45-day comment period). The public was invited to share their ideas on the future redevelopment and management of the Caneel Bay area and provide feedback on the information presented in a newsletter, Frequently Asked Questions (FAQ) document, and virtual public meeting presentation. Three preliminary alternatives and a no action alternative were presented along with background information, the draft purpose and need, and potential environmental issues. The public was encouraged to comment on each of these project elements during this early stage of planning referred to as pre-NEPA.

To prepare for the civic engagement public comment period, the NPS issued a press release on November 22, 2021, alerting the public to the start of the planning process and the upcoming civic engagement period, as well as the continuation of the Engineering Evaluation and Cost Analysis (EE/CA) process.

The week of January 10, 2022, the NPS provided a briefing to the DOI Congressional Affairs Office, Senator Angus King's¹ staff, and the senior attorney for the U.S. Senate Energy and Natural Resources Committee. The week of January 18, 2022, NPS provided a briefing to the Virgin Islands Governor's Office and the Virgin Islands Delegate to Congress.

On January 18, 2022, the NPS issued a press release announcing the civic engagement public comment period and public meeting. This press release resulted in seven articles published in local, high-circulation publications. The NPS posted the announcement on social media and updated the Park's website with information on the public comment period. The project newsletter, a FAQ document, and other relevant materials were posted to PEPC. The newsletter and press release were distributed to the Park's mailing list, which included eight local non-governmental organizations (NGOs), government officials, consulting agencies, commercial use authorization (CUAs) holders, and approximately 1,000 citizens.

In addition, 150 hard copies of the newsletter and comment cards were made available at the Park's visitor center during the week of January 18, 2022. The NPS printed and distributed 150-200 newsletters with cover letters specific to seven community groups and their members including: St. John Historical Society, Island Green Living Association, StJanCo: The St. John Heritage Collective, Friends of Virgin Islands National Park, St. John Community Foundation and St. John School of the Arts. These newsletters were also provided by email and each organization was encouraged to share the newsletters with their members. On January 28, 2022, the NPS posted to social media a direct link to the newsletter, reminding the public of the February 8, 2022 virtual public meeting, and encouraging the public to submit comments through PEPC.

In February 2022, the NPS hosted a series of meetings and outreach events to reach a wide array of interested stakeholders and the general public as detailed below. 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

¹ Senator Angus King (Maine) sits on the U.S. Senate Energy and Natural Resources Committee and is the Ranking Member of the Subcommittee on National Parks.

NPS's PEPC website at <http://parkplanning.nps.gov/CaneelBayRedevelopment>. The NPS hosted the following meetings:

- **Agency Partners** - On February 1, 2022, the NPS hosted an agency meeting with participants from the Virgin Islands Department of Planning and Natural Resources (DPNR) Divisions (Coastal Zone Management Division and Water Pollution Division), the National Marine Fisheries Service, US Fish and Wildlife Service, and the State Historic Preservation Officer.
- **Business Community** - On February 3, 2022, the NPS hosted a 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 meeting with local community groups. The meeting was attended by 47 participants, representing over seven community groups from the Virgin Islands.
- **Virtual Public Meeting** - On February 8, 2022, the NPS hosted a virtual public meeting welcoming 241 participants. A recording and transcription of the February 8th 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 expanded its outreach and extended the public comment period. On February 8, 2022, the NPS announced an extension of the civic engagement public comment period for two additional weeks through March 4, 2022, 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.

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. 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 news release on February 26, 2022. Comments were also accepted at the meetings, by mail, and in person at the Park. 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. Most of the correspondences were submitted by

unaffiliated individuals but some were submitted by local organizations. Correspondences were received from a diverse range of geographic areas including strong representation from individuals and local organizations on St. John. The majority of the correspondence was received from 48 states and territories of the United States, with approximately a quarter of the total correspondence being submitted by individuals from the U.S. Virgin Islands. A few correspondences were also received from other countries.

Definition of Terms

The primary terms used in this document are defined below:

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

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

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

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

Comment Analysis Methodology

As stated above, 723 pieces of correspondence were received during this round of civic engagement outreach. Correspondence was received directly into PEPC, hard copy via US mail, delivered in person to the Park headquarters, and through each of the four meetings held during civic engagement. Letters received through the US mail, or submitted in person at the Park, as well as the comments received from the public meetings, were entered into the PEPC system for analysis. Once the correspondences were entered into PEPC, each correspondence was read, and specific comments within each correspondence were identified.

Each comment was given a code to identify the general content of the comment, and to group similar comments. An example of a code developed for this project is *AL2100 – Alternative*

Concept: Natural and Cultural Resource Protection. Thirty-two codes were developed to categorize the public comments. In some cases, the same comment may be categorized under more than one code, reflecting that the comment may contain more than one issue or topic.

Concern Report

This report summarizes the comments received during civic engagement public comment period. The table below provides the list of concern statements by code.

Code and Corresponding Concern Statement
AL2000 – No Action Alternative
<ul style="list-style-type: none"> Commenters stated that the No Action Alternative would not meet Laurance Rockefeller's vision and would deprive future generations from experiencing the Caneel Bay area. Commenters stated that the No Action Alternative would not contribute to the local economy, would provide no preservation or interpretation of resources, and would provide no community or commercial resources. Alternatively, commenters also expressed a desire to see the No Action Alternative implemented for natural and cultural resource protection, and for beaches, trails and historical elements on the property to be open for access by any visitor.
AL2100 – Alternative Concept: Natural and Cultural Resource Protection
<ul style="list-style-type: none"> Commenters suggested that development should provide protection and restoration of natural resources (beaches, trails, flora and fauna, marine, threatened and endangered species) and cultural resources (historic ruins and archeological sites). Commenters also stated that future operators at the site should be held accountable for natural and cultural resource protection and that the NPS should develop a Protection and Resiliency Plan to inform future decisions.
<ul style="list-style-type: none"> Commenters submitted ideas for natural and cultural resource protection including lighting plans for sea turtle and dark night sky protection, management of structures in floodplains, best management practice considerations for construction, native vegetation buffers, and renewable energy alternatives.
AL2200 – Alternative Concept: Context Sensitive Redevelopment
<ul style="list-style-type: none"> Commenters supported options that reflect Laurance Rockefeller's vision for the Caneel Bay Area. Commenters supported preserving the character and design that Caneel Bay Resort had established in the past, while other commenters stated the property should be returned to the NPS for enjoyment by the larger public without a resort present.
AL2300 – Alternative Concept: Resort Guest Experience

<ul style="list-style-type: none"> • Commenters prefer luxury resort accommodations at the Caneel Bay area and feel that increasing public access or creating mid-range accommodations within the site would negatively impact the visitor experience in terms of privacy and exclusivity.
<ul style="list-style-type: none"> • Commenters supported a range of accommodations at the Caneel Bay area to allow for more visitors to enjoy the site outside of luxury resort visitors. In addition, commenters asked that community spaces be developed in a way that benefits the resort experience as well as the local community. Examples include experiences that reflect the local culture of St. John through culinary experiences and artisan experiences.
<p>AL2400 – Alternative Concept: Public Access</p>
<ul style="list-style-type: none"> • Commenters stated the importance of increasing public access to the beaches, trails, ruins, and the resort amenities at the Caneel Bay area while preserving natural and cultural resources.
<p>AL2500 – Alternative Concept: Transportation</p>
<ul style="list-style-type: none"> • Commenters requested increased transportation options such as a ferry service, pedestrian paths, dinghy access from adjacent moorings, additional parking spaces, and a shuttle service due to crowding and congestion on the roads of St. John; however, some commenters expressed concern that increased parking and the proposal for a new road at the Caneel Bay area could impact the environment, the visitor experience, and would be difficult to maintain.
<p>AL2600 – Alternative Concept: Park Operations</p>
<ul style="list-style-type: none"> • Some commenters expressed concern about the NPS's ability to manage or provide oversight to the Caneel Bay area under any of the preliminary alternatives given budgetary and staffing constraints.
<p>AL2700 – Alternative Concept: Zoning</p>
<ul style="list-style-type: none"> • Commenters expressed concerns with the size and/or location of the proposed zones within the study area. Commenters requested that the acreage be provided for each zone.
<p>AL2800 – Alternative Concept: Community Involvement</p>
<ul style="list-style-type: none"> • Commenters expressed concern that the community of St. John was not involved in developing the preliminary alternatives and that the community should decide what development option is chosen for implementation. Commenters stated that the local community and cultural history of St. Johnians should be first considered when determining the use of the Caneel Bay area and that any proposed development should employ members of the local workforce; commenters suggested that this could be achieved by creating an advisory board that includes leaders of the community. Commenters stated the Caneel Bay area development should incorporate training and educational opportunities for the local community in partnership with the University

<p>of the Virgin Islands. Additionally, many commenters expressed a desire for a facility such as community center, museum and/or amphitheater on the property for the community.</p>
<p>AL3000 – Alternatives - New Alternatives and Elements</p>
<ul style="list-style-type: none"> • Commenters suggested new alternatives and/or elements should be considered in the EA. These suggestions include: <ul style="list-style-type: none"> ○ Establishment of long-term and short-term housing for employees ○ Camping opportunities or modest cabin/tent sites similar to Cinnamon Bay rather than a resort ○ No resort and a variety of overnight accommodations available at the site at varying prices ○ No resort or overnight accommodations but concessions opportunities at Honeymoon Beach and Hawksnest Beach and restaurants available at the site ○ A boutique style resort ○ Moving the mid-range overnight accommodations to Little Caneel or Caneel Bay beach ○ Break up the resort into separate commercial services to protect workers and increase competition and business opportunities ○ Reintroduction of the donkeys ○ Construction of eco-friendly facilities ○ Installing a golf course ○ Implementing fees for docking/parking ○ Increasing boat access and additional moorings ○ ADA paths at beaches ○ Combining elements of alternatives, such as a version of the no action alternative that includes a community facility ○ Public amenities at every beach ○ Limiting vehicle access ○ Other uses for the site including an astronomy site, a site devoted to self-care and health, a retirement community, a vocational school, a hospital, an elder care facility, an open-air market and farmers market, festival site, and/or a special events site ○ Agricultural use of the site to serve the local community ○ Community facilities such as a playground, botanical gardens and community garden spaces
<ul style="list-style-type: none"> • Commenters desired additional or full public access at beaches not included in the range of alternatives, with many requesting that all beaches on the island be open to the public.
<p>CC1000 – Consultation and Coordination</p>

<ul style="list-style-type: none"> • Several commenters expressed concern regarding public outreach to the local community for the NPS civic engagement public comment period. This included a concern about those in the community who do not have access to a computer.
<p>CL1000 – Competitive Lease or Concession Process</p>
<ul style="list-style-type: none"> • Commenters provided suggestions regarding the length and nature of potential leases or concession contracts, including the desire for the community of St. John to play a role in selecting developers or operators for the site and for a locally owned non-profit organization to manage the site. Some commenters expressed that any future lease or concession contract should require local employment, should include a mechanism for the NPS to rate proposals on their ability to work with St. Johnians, and include oversight from the local community. Commenters also requested additional information on how the NPS would calculate the rent for any future developer or operator and where this revenue would go.
<p>CO1000 – Contamination and Clean Up</p>
<ul style="list-style-type: none"> • Commenters stated that future activities at Caneel Bay should include clean-up of the property as well as remediation of any environmental contamination. Commenters stated that funding should be secured and the site should be remediated before any commercial services agreement is implemented.
<p>ED1000 – Data, References, Figures, Request for Information</p>
<ul style="list-style-type: none"> • Commenters requested additional information regarding the project, or that additional data be incorporated into the analysis, including: <ul style="list-style-type: none"> ○ Additional details for each preliminary alternative, as well as more descriptive graphics/mapping of the preliminary alternatives, including the no-action alternative ○ Locations of flood zones, storm surge zones, and sea level rise data, as well as a coastal facility vulnerability assessment ○ Explanation of who will receive the potential economic benefits from redevelopment of the site ○ Data on the number and type of visitors to the park ○ Clarification on terminology, such as specific descriptions of what a mid-range overnight experience entails ○ An analysis of which visitor services are necessary and/or appropriate ○ Incorporating the conclusions of relevant economic and comprehensive plans, such as the Virgin Islands Vision 2040 Economic Plan and Virgin Islands Comprehensive Land and Water Use plans: Decades in the Making, a Virgin Islands Comprehensive Land and Water Use Plan is Back on the Table for Lawmakers and DPNR (viconsortium.com) ○ Reviewing and incorporating available GIS data of natural and cultural resource locations.

<p>IS1000 – Issues and Impact Topics: Coastal Resources and Floodplains</p>
<ul style="list-style-type: none"> • Commenters expressed concern that increased development, and resulting increased visitation, would negatively impact coastal resources at the park; in addition, construction activities and earthwork could lead to erosion and sedimentation that could impact coastal resources. Commenters suggested that the project follow Best Management Practices (BMPs) to minimize potential impacts. Furthermore, commenters stated that construction in the floodplain should only be low impact, low maintenance structures (i.e. trails) and vulnerable structures in the floodplain should be relocated.
<p>IS1100 – Issues and Impact Topics: Socioeconomics</p>
<ul style="list-style-type: none"> • Commenters stated that development of the Caneel Bay area would help improve the local economy via employment and commerce and requested that year-round employment be made available to those in the community. However, commenters expressed concern for the lack of affordable housing for potential employees, as well as potential impacts to local businesses from increased rents and competition over the workforce. Commenters desired a range of affordability options for overnight accommodations at the Caneel Bay area.
<p>IS1200 – Issues and Impact Topics: Visitor Use and Experience</p>
<ul style="list-style-type: none"> • Commenters said that a lack of access and/or restrictive access to beaches and amenities negatively impacts the visitor experience and the desirability of Caneel Bay.
<ul style="list-style-type: none"> • Commenters said that increased day-use beach access would make the existing beaches crowded, negatively impacting the visitor experience. Commenters stated that increased development would exacerbate crowding, traffic, and impacts to the environment in and around the Caneel Bay area.
<p>IS1300 – Issues and Impact Topics: Archeological Resources and Historic Structures and Districts</p>
<ul style="list-style-type: none"> • Commenters stated that archeological sites, historic structures, and the colonial and postcolonial ruins at the Caneel Bay area are important and should be preserved and suggested that archeologists should investigate the site for known and unknown resources prior to any construction activities commencing.
<p>IS1500 – Issues and Impacts Topics: Ethnographic Resources</p>
<ul style="list-style-type: none"> • Commenters expressed a desire to see future development at the Caneel Bay area include opportunities to interpret the island's pre-Colonial history. Commenters requested that the NPS analyze and disclose ethnographic resources and cultural resources at the site to prioritize preservation and interpretation of such resources.
<p>IS1600 – Issues and Impact Topics: Other (Traffic, wildlife, etc.)</p>

<ul style="list-style-type: none"> • Commenters said that increased visitation to the island resulting from the preliminary range of action alternatives would negatively impact wildlife and other animals such as the feral donkeys, as well as parking and traffic. Commenters stated that the proposed development should incorporate potential impacts to environmental justice, dark night skies, vegetation, soundscapes, socioeconomics, and threatened and endangered species.
<p>PN1000 – Purpose, Need, and Objectives</p>
<ul style="list-style-type: none"> • Commenters disagreed with the inclusion of overnight accommodations in the NPS's purpose statement. Commenters stated that the purpose statement did not adequately address how to benefit the St. John community. Other commenters felt that there was no need for resort accommodations as they are already widely available. Commenters supported the Purpose and Need but expressed that the planning process in general has taken too long.
<p>SA1000 – Study Area</p>
<ul style="list-style-type: none"> • Commenters said that Hawksnest Beach has been misidentified in the preliminary range of alternatives and that the development should be confined to the Caneel Bay footprint.
<p>SR4000 – Sustainability and Resiliency</p>
<ul style="list-style-type: none"> • Commenters suggested that development should be done in an environmentally sustainable way and incorporate eco-friendly or green design and renewable energy sources. Commenters stated that existing and proposed structures should be designed to withstand severe weather events on the island as well as sea level rise and climate change related impacts and include height restrictions. One commenter stated that the NPS should provide the most stringent requirements and guidelines possible to future developers/operators to ensure compliance with a high sustainability standard.