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December 27, 2022

The Honorable Jean-Pierre Oriol
Commissioner
Department of Planning and Natural Resources

The Honorable Winston Adams
Chairman
St. Thomas Committee of the V.I. Coastal Zone Management Commission

The Honorable Marlon Hibbert
Director, V.I. Coastal Zone Management Commission
C/O Virgin Islands Department of Planning and Natural Resources
4611 Tutu Park Mall, Suite 300
St. Thomas, Virgin Islands 00802

Re: Jack Rock B-A C, LLC d/b/a Latitude 18 ("Latitude 18" or the "Applicant") Major Permit Application No. CZT-06-21 (L&W) (the "Application")

Supplemental Filing and Response to Oral and Written Public Comments at and following the September 15, 2022 Public Hearing on the Application as well as Comments and Questions of the Members of the St. Thomas CZM Committee and CZM staff during the site visit conducted on September 22, 2022 in Connection with the Application.

Dear Gentlemen,

We are pleased to make this supplemental filing in response to the issues raised (1) during the site visit by members of the St. Thomas Committee of the V.I. Coastal Zone Management Commission (the "CZM Committee") and staff of the Division of Coastal Zone Management ("CZM Staff") of the V.I. Department of Planning and Natural Resources ("DPNR") to the Latitude 18 project site on September 22, 2022, and (2) by the comments made by the public during the public hearing held on September 15, 2022 and in subsequent written filings.

We have taken all comments into consideration and have attempted to address the concerns of the CZM Committee, the CZM Staff, the neighbors of Latitude 18, boaters anchored in Red Hook Bay, as well as the general public.

Representatives for the project have connected with multiple charter companies out of Red Hook. All are excited about the opportunity for expanded marine services in the area. Local boaters were encouraged to hear that additional service providers will be accessible on the East End as well. Both

groups look forward to the marina restoration and the shore side development. An additional boater friendly destination on the East End was well received.

Through a developing relationship with board members of the Virgin Islands Professional Charter Yacht Association Latitude 18 was able to connect with current mooring holders in Muller Bay and share the project's direction. This was well received and resulted in additional conversations and support from current residents.

Below we have grouped the issues into categories and provide Latitude 18's response.

1. CZM COMMITTEE/CZM STAFF COMMENTS

a. Public Engagement

Representatives of Latitude 18 have reached out to public organizations, yacht charter companies, including the Virgin Islands Professional Charter Association ("VIPCA"), representatives of East Wind Condominium, representatives of the VI Port Authority as well as members of the public so that we could better understand their concerns and find ways to address those concerns.

Most of that outreach has been very well received and those groups have shown an interest in working with Latitude 18.

b. Zoning

The site planned for development by Latitude 18 is Zoned W-1. The marina and its facilities, the restaurant, fuel facilities, boat storage and related support services are all permitted as a matter of right in the W-1 zone. Except for the period while it has existed in its hurricane damage state, the site has been used as a marina for recreational crafts for decades and the Latitude 18 Application proposes to restore those uses.

c. Beach Comments

Latitude 18's Application does not include development or use of the Vessup Bay Beach. Nothing in the Application will prevent or interfere with existing beach access or use rights held by adjacent landowners. And nothing in the Application compromises use of or access to the shoreline under the VI Open Shorelines Act. In fact, the Project will enhance public access to Vessup Bay Beach and will include limited public parking for beach goers.

d. Mooring Field

Latitude 18 has decided to withdraw its proposed mooring field for Vessup Bay. With respect to the mooring field proposed for Muller Bay two things must be noted at the outset: 1. Nothing in the plan for the managed mooring field will deprive DPNR of any of its jurisdiction or regulatory authority accorded upon Chapter 16 of Title 25 of the Virgin Islands Code; and 2. The managed mooring field will be occupied and operated by Latitude 18 pursuant to a submerged lands lease between the Government of the U.S. Virgin Islands ("GVI") and Latitude 18.

The leasing of submerged lands by the GVI is common throughout the Territory. There are existing mooring fields in the Territory that are managed by the St. Thomas Yacht Club on the island of St. Thomas and by the St. Croix Yacht Club on the island of St.

Croix. There are privately managed mooring fields in adjacent Puerto Rico and several in the state of Florida and others along the coastal states of the United States.

Enclosed as Exhibits A and B is are the Outline of the Latitude 18 Managed Mooring Field and Mooring Field Site Plan This outline reflects input received from representatives of VIPCA and directly responds to some of their concerns.

On December 5, 2022, a survey was conducted of all the moorings in Vessup Bay and Muller Bay by Latitude 18 accompanied by Jessica Magras-Parris, Assistant Director of DPNR's Division of Environmental Enforcement ("DEE"). All moorings were geolocated using the Global Positioning System ("GPS") and were compared to the Geolocations of the vessels contained in DPNR files. Approximately 50 to 60% of the vessels identified have currently licensed moorings or had mooring registrations that were less than 1 year out of date. Assistant Director Magras-Parris informed us that DEE typically reaches out and reminds individuals to renew their registrations and moorings. There were vessels anchored in the mooring field, that have applied for mooring permits and are just awaiting issuance. There were other vessels anchored in the Bay for which DPNR/DEE has no records. The vast majority of the legal moorings in Muller Bay are held by charter companies, which use the licensed moorings for a variety of vessels.

There was one sunken vessel on a mooring for which DEE was trying to identify the owner, and several vessels in very poor condition that appeared not have to been moved for long periods of time. Some vessels appeared not to be able to meet the statutory requirement of being able to move on their own power. Several moored vessels had numerous boats and dinghies tied to them. And during the survey, boats were noted that were too large for the moorings they were on and, in one case, a large charter vessel was bumping up against a smaller older sailboat due to the wind shifting.

There was a sunken vessel within Vessup Bay that Assistant Director Magras-Paris said they had been trying to get the owner to remove or have salvaged. The owners continue to say they are going to salvage the vessel themselves, however it has continued to sit on the bottom of the Bay for more than one year. DEE must follow strict guidelines on vessel salvage.

Due to expressed public concerns on the combined size of mooring fields as noted earlier, the Vessup Bay Mooring field is being removed from the Applicant's development plan.

e. Cleaning of Debris

As part of the proposed project the debris in and around the marina will be removed during construction. There is a vessel on the shoreline that is of concern, and as per discussions during the site visit, Coastal Zone Management has attempted to have the vessel removed as part of their cleanup programs, but the owner intervened and said they were salvaging the vessel. Division of Environmental Enforcement Assistant Director Magras-Paris also informed us that they had been in contact with the owner several times and the owner continued to state that they were going to remove the vessel. The vessel has recently been stripped of hardware whether by the owner or someone else. It appears the owner has no plans to remove it. If it is not removed, Latitude 18 will have to remove and dispose of this vessel at the start of construction.

Latitude 18 will go through the appropriate regulatory process to have the vessel removed.

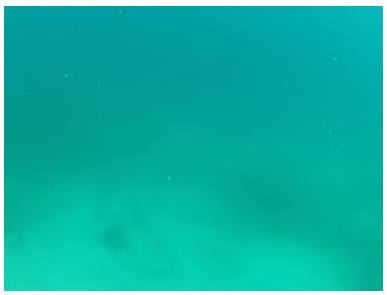
As part of the Compensatory Mitigation for the project, debris within the mooring field will be collected and disposed of at the Bovoni landfill. Small pieces of debris will be picked up by hand by divers and larger pieces will be collected utilizing lift bags. Care will be taken to ensure any fish or invertebrates in the debris are not accidently removed from the water. Any debris that is coral colonized will not be removed.

f. Maintenance and Operation Plan

Please see the enclosed Exhibit B - Maintenance and Operational Plan

There are moorings in Muller Bay that are properly installed, using appropriate tackle that does not drag on the seafloor under normal conditions. Chains and ropes should not be allowed to reach the seafloor where they can drag and damage seagrasses and corals in those areas with scattered hard bottom. There are numerous improperly installed moorings, which have ropes and chains dragging on the seafloor creating halos, and many moorings simply need to have floats placed on lines to keep them off the bottom. Routine maintenance of many of these moorings would make a difference. There are vessels on moorings also with anchors out, probably placed prior to approaching storms and simply not removed.


These four-point moorings have chains that drag on the bottom and as the vessels shift with changing wind direction, they erode away the turtle grass (*Thalassia testudinum*). These are improper moorings and should have floats on all the chains and a float on the main line to keep all tackle off the bottom. Many boaters with currently licensed moorings believe that they have proper moorings if they are using helix or screw anchors, which is not the case.



The ropes and chains which drag the seafloor result in large areas of seagrass loss.

And as vessels leave, or sink they sometimes leave debris or anchor blocks which continue to damage the environment. Because no one is managing the mooring field, these items are not removed.

All of these issues would be addressed by Latitude 18 as a part of its Management of the Mooring Field, would be prescribed by the Lease between the GVI and Latitude 18, and enforceable by DPNR/DEE.

g. Marina

The distance between the fuel pier and the passenger ferry terminal dock is 285ft, and the distance between the main project pier "T" and the car ferry dock is 365ft at its closest point. As per the assessment prepared for Latitude 18 by Applied Technology Management, Inc. ("ATM"), marine engineers and surveyors, the required passenger ferry turning basin is 180ft and the car ferry turning basin is 280ft. An adequate maneuvering area has been provided for both the public terminal and the proposed marina expansion. See Exhibit C as well as the diagram below. The project has received an updated letter from the Virgin Islands Port Authority stating that there is no conflict between operations of VIPA's marine terminals and the Latitude 18 Marina (see enclosed Exhibit F).

h. Lighting on Docks

Both the docks and the wave attenuator will have U.S. Coast Guard approved lighting to assist in safe navigation within the harbor. Lighting will be turtle friendly so that it does not impact the adjacent turtle nesting beach. During nighttime surveys of other marinas, it has been noted that some of the lights on masts cast large illumination footprints and can impact nearby beaches. Owners of vessels within the marina and the managed mooring field will be informed of the adjacent sea turtle nesting beach and will be instructed on the use of their lighting to help Latitude 18 protect the sea turtles.

i. Navigation to Docks

The length of boats that will dock in the marina will vary from 30 feet to more than 100 feet. Vessels will be required to check in by marine radio with the dock master as they are coming into dock or leaving the marina. The dock master will inform the vessel of the adjacent ferry operations and will inform the captains of the vessels of the need to wait for the ferries or other large vessels to clear the area. VIPA marine terminal operations will have priority. This process is followed at both Crown Bay Marina and Yacht Haven Grande in St. Thomas

j. Dredging

Dredging will be necessary for the development of the Latitude 18 marina. The dredged material will be dewatered on the shoreline located on Latitude 18's property adjacent to areas that are being dredged. The area where effluent from the dewatering re-enters the sea will be surrounded by a double set of turbidity barriers offshore, and hay bales and silt fencing adjacent to the de-watering area. This activity will be

monitored as part of the Water Quality Monitoring Plan. If measures are found to be inadequate to contain turbidity additional measures will be implemented. The Water Quality Monitoring Plan describes the steps that will be taken if turbidity issues occur, which includes implementation of additional environmental protection measures, slowdowns of the dredging process and, where warranted, entire interruption of the dredging work.

Once de-watered, material will be used as fill behind the bulkhead as well as on the site to bring the project site to appropriate elevations as a mitigation for coastal flooding.

Exhibit A provides drawings of the dredging and dewatering plan.

k. Final Site Elevations

The proposed site elevations have been designed with coastal resiliency in mind. The highest elevation on the site will be 12ft after site grading, the highest elevation located on the site is currently 12ft. This existing high point is near the shed to the southeast of the old marina/restaurant building. The existing and proposed elevations area shown on the Civil drawings in Appendix E

It should be noted that in order to ensure that the view corridor from East Wind Condominiums looking northeast out of Red Hook Bay is maintained, the placement of certain structures on this site plan have been revised (below and revised plans).

l. Design Threshold for the Wave Attenuator

The wave attenuator is designed to be dismantled and removed from the water, which will occur any time an official tropical storm or hurricane watch is declared.

m. Waterside Provisioning

It is possible that some materials used for the construction of the marina will be delivered by barge, which would reduce traffic and impact to roadways into the site. All marine related components will be delivered to site on construction barges.

n. Upland Issues

Drainage Pond – Sizing and Overflow

The on-site stormwater pond has been designed to meet or exceed the requirements prescribed by the Division of Environmental Protection of DPNR ("DEP"). The stormwater pond is designed to provide water quality treatment for the site immediately after a rainfall event. In this regard, water quality treatment entails collecting and directing on site water to the stormwater pond during a rainfall event and allowing the sediments and nutrients to settle and be removed within the pond. Per best management practices within the Saint John's River Water Management District, the criteria used to determine the water quality treatment volume was based on the greater volume of either 1" of rainfall across the entire site, or 2.5" of rainfall on impervious surfaces. Per the calculations, a greater volume of runoff was generated by the 2.5" of rainfall over the impervious surfaces. The volume created by the 2.5" of runoff constitutes the "water quality" design parameter. This criterion is more stringent than the requirements that are set forth in regulations provided by DEP.

For any rainfall event, runoff generated on-site will be collected by stormwater inlets strategically located throughout the site. These inlets will initially direct the runoff through secondary stormwater piping to the primary stormwater pond. Under normal rainfall conditions the pond will allow for the settling of sediments and for the uptake of nutrients. In rainfalls that exceed the capacity of the pond, the pond will serve to slow the discharge rate of the runoff and will allow for some settling of larger particles and materials.

The pre and post development conditions have been modeled in **AdICPR4** and shows that for each of the rainfall events run (2-year, 10-year, 25-year, and 100-year events), the post-development discharge by the Latitude 18 marina is lower than the predevelopment discharge for a similar event. The design for the Latitude 18 project improves the discharge conditions by including the on-site stormwater pond.

Once the stormwater runoff reaches the elevation of the outfall structure weir crest, the water quality treatment of the first 2.5" of rainfall on the impervious surfaces will have been met. When runoff events occur beyond 2.5" of rainfall the runoff will discharge over the control structure weir. The system has been designed such that the piping will discharge into the pond until it reaches the 2.5" containment then it will begin overtopping the weir and flow freely into the Bay.

In addition, oil-water separators will be installed downstream of each of the proposed boat washdown areas to prevent the introduction of oils and greases into the marine environment. The washdown runoff from these maintenance operations will be collected in a designated secondary stormwater system that will run through the oil-water separator and then into the on-site pond. A maintenance schedule will be

implemented to ensure that oil water separators are cleaned out systematically and collected oil properly disposed.

o. Runoff from Boat Yard

The retention pond will capture water from the boat yard. The water from the boat yard will pass through an oil-water separator prior to being directed to the retention pond. The oil-water separator will remove oils and grease from the collected water prior to discharging into the retention pond. All runoff from areas within the marina with the potential for the introduction of hydrocarbons will be directed through the oil and water separator.

Drainage plans are found in the Civil drawings in Revised Plans.

p. Dry Stack Storage

The development team analyzed the amount of dry storage currently available on St. Thomas. The team found that there was an opportunity for a modern and efficiently operated dry stack storage facility with high standards and for relatively low weight but larger speed boats and boats with center consoles. The existing dry stacks at Tropical Marine and East End Boat Park on St. Thomas are older. The marina being proposed is relatively small in size and in water slips will be prioritized for larger boats. The dry storage will provide an option for the owners of small to medium boats up to 40 feet LOA to store and conveniently use their boats when needed.

q. Road and Vehicular Access

Access to the site will be of concern to Latitude 18 both during construction and subsequent operation. During the construction phase, Latitude 18 will bring as many of the larger components as possible to the site by vessel, and all the dock components will come in by vessel. Road improvements will have to be made and maintained during construction in order to access the site and Latitude 18 will repair any damage during construction so that access to the site and use by neighboring owners and other users of the road will not be adversely impacted. Once the development is complete, Latitude 18 will repair and resurface the entire roadway. Once the marina is in operation, Latitude 18 will have a maintenance plan for the roadway.

r. Alternatives to Potable Water Delivery

The marina will utilize roof catchment and reverse osmosis potable water production to meet its potable water demand. The seawater intake will be placed under the fuel dock approximately mid-way between the sea surface and the sea floor. The piping will be placed immediately below the dock, with the intake using a wedge wire intake screen about mid water depth (a spare intake screen will be kept on hand to be swapped out when one screen fouls and for cleaning). The intake line will be installed so it can be removed prior to storms to prevent damage and to allow rapid redeployment after storms.

s. Industrial Use

As noted earlier in the section on zoning, the proposed activities on the site are not industrial uses. All activities are allowable uses under the existing zoning, W-1.

Furthermore, the site has been used as a marina, for boat storage and boat repair for more than 40 years since the marina was initially developed.

t. Impact on Existing Marine Professionals

As noted in the Latitude 18 Managed Mooring Field Outline, included as Exhibit B, boats with legal moorings and permits issued by DPNR will be allowed to remain and will not be charged additional fees unless they choose to utilize the Latitude 18 facilities or services.

u. Pond and Landscaping as Habitat

The sediment basin is being designed with native tree species planted around the perimeter and within the basin and with native grass communities in the catchment area. Native plant species are being planned for installation throughout the project landscaping. The pond and landscaping have been designed to provide corridors to adjacent forested land for VI Tree Boa movements and the herbaceous and forested areas will provide habitat for both avian and reptile species, thus providing prey base. The plan is to create a green space that provides not only a runoff water storage catchment area but also habitat for species much as other pond/wetlands do throughout the Territory. Wetter areas have high species diversity and abundance. This area will not be frequently disturbed and will allow species a protected area in which to thrive.

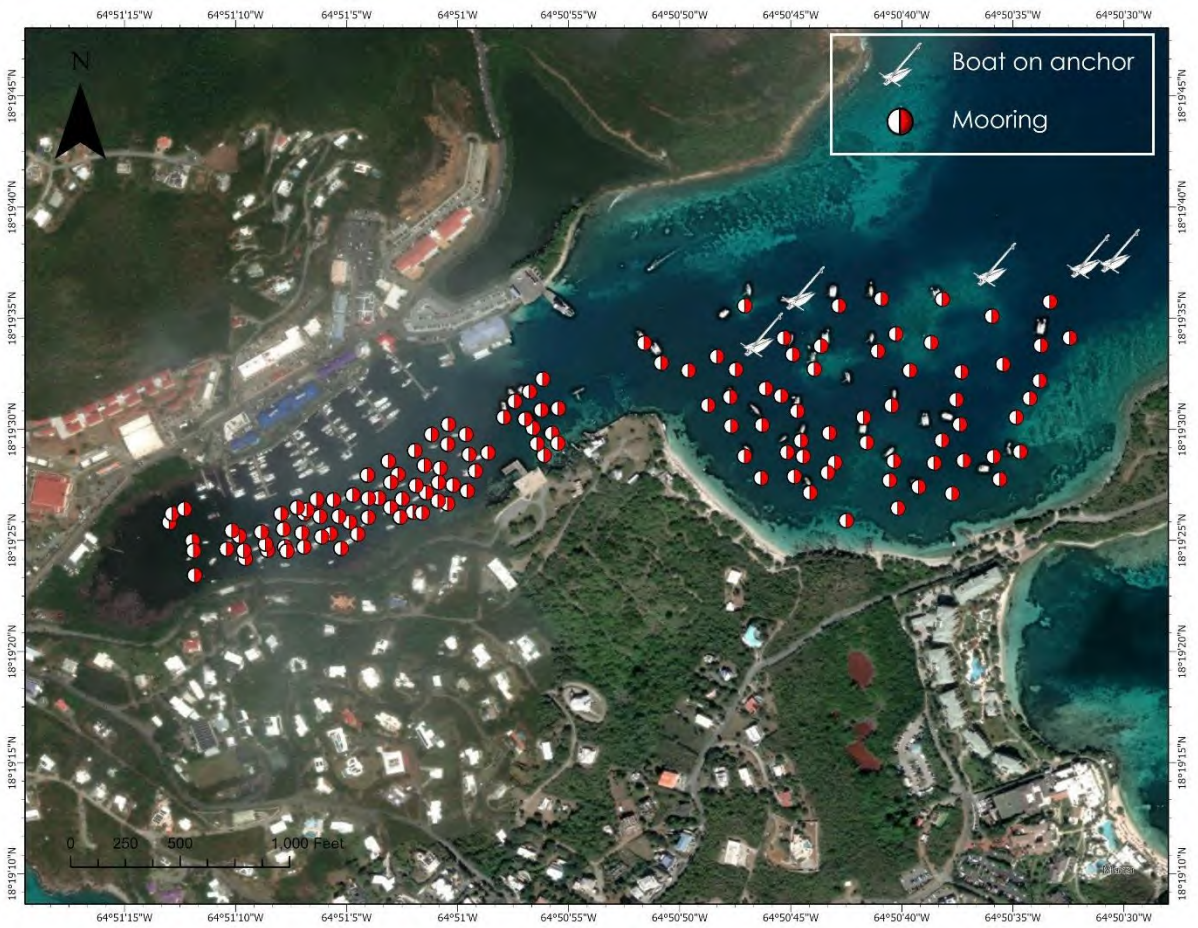
As shown in the drawing above on the left, vegetation will be planted both along the sides of the pond as well as in the retention basin itself. The trees will be planted to create "corridors" through the retention areas so Virgin Islands tree boas can move above the ground throughout the area. A cross section is shown on the right. The trees will include water mampoo, pegion berry, buttonwood mangrove and other native species.

2. PUBLIC COMMENTS

a. Size of Mooring Field

The Latitude 18 Managed Mooring Outline for Muller Bay (Exhibit B) and the Overall Site Plan for the Muller Bay Mooring Field (Exhibit A) describe the proposed management and suggested layout of moorings in Muller Bay. As noted earlier, management and reorganization of moorings in Vessup Bay is no longer being contemplated as part of this project.

The map below documents the vessels that are currently moored in Vessup and Muller (December 5, 2022). The managed mooring field for Muller Bay would provide more organized mooring and prevent boat conflicts when winds shift from the prevailing direction.



b. Scale of industrial scope

The project does not have an industrial scope. As described earlier in this document, every proposed activity to be located in the Latitude 18 marine is allowable under the W-1 zoning.

c. Size of boats and scale of in water marina

The developer, during further design development prior to construction, will review the size and variety of boat sizes as they relate to market needs and overall project economics. It is anticipated that, once operational, the sizes of the boats using the marina will change throughout the year as they do in other marinas in the Territory. The developers intent is to serve medium sized vessels that are too large to haul out, such as charter vessels, and not mega yachts. Latitude 18 does not intend to compete with Yacht Haven Grande for super yacht customers.

d. Neighborhood Concerns

Proximity of the project to a residential neighborhood.

As per the VI Zoning code;

"Side yards

Every structure in the W-1 District shall be separated from any adjacent residential structure or property zoned for residential purposes by a minimum side yard on each side of the structure of not less than ten (10) feet.

Rear yard

Every structure in a W-1 District adjoining a residential structure or property zoned for residential purposes shall provide a minimum rear yard of at least twenty (20) feet."

The Latitude 18 marina as developed will fully comply with the statutory requirements for W-1 zoning. Further, in preparing this supplemental filing, Latitude 18 has met with different representatives of the neighboring community to discuss their concerns and, as a result, the site plan for the marina has been modified (see Exhibit A). The Applicant also plans to meet with the community during key decision phases through schematic design and design development of the marina.

e. Noise, safety, and increased traffic

Except for the period it was damaged by the hurricanes, Latitude 18 has been an active marina, boat repair area and bar and restaurant for more than 40 years. The area also lies across the narrow Vessup Bay from a very large marina, several times the size of the Marina proposed by Latitude 18, with active bars and restaurants.

The project will increase traffic during construction and will increase traffic when the marina operations commence. Most of the activity on the site will be occurring during the day and on weekends when most boating activities occur. As noted earlier, Latitude 18 will be resurfacing the entrance roadway once construction is complete (and will be maintaining the roadway during construction) this should improve traffic and driving conditions over the current conditions.

There will be a increase in noise once the project is complete, however this will be removed from the residential neighborhood due to the location of the marina and facilities on the site. The warehouse and boat yard are more than 400ft from the nearest residential structure and will operate only during daylight hours.

f. Lack of Sufficient Open Space

The U.S. Virgin Islands Zoning Code defines Open Space as follows:

"Open space, useable

That space or area on the same lot as the principal building designed and accessible for outdoor

living, recreation, pedestrian access, or landscaping, but excluding that portion of the lot that is utilized for off-street parking purposes and drive aisles, entrances, and exits.

Open space, useable landscaped

The space or area on the same lot as the principal building that is either landscaped with shrubs or

trees or planted with grass and excluding that portion of the lot that is utilized for off-street parking purposes and drive aisles, entrances, and exits."

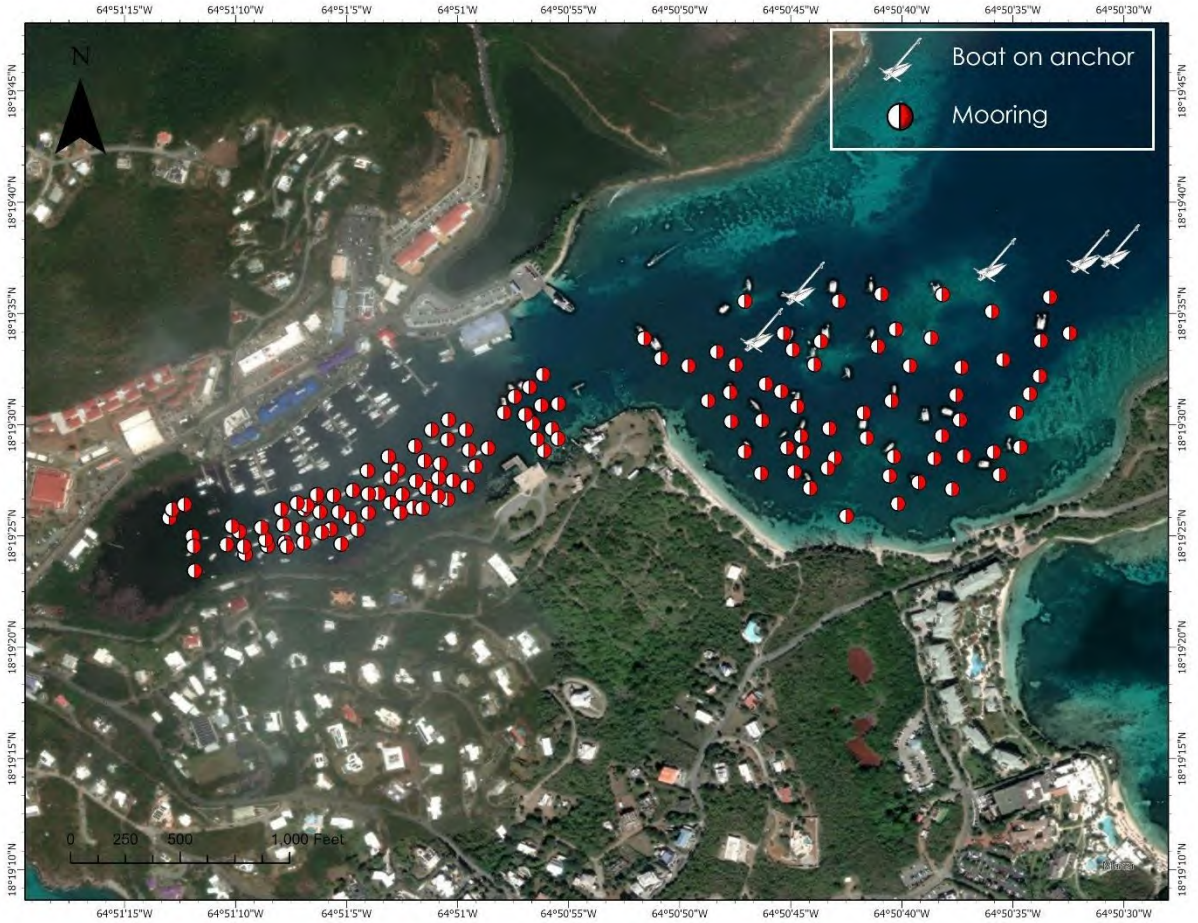
The pond will have native trees and vegetation on the banks and will have herbaceous plants in the "basin". The area will provide areas for tree boas, other reptiles and avian species. There are also green open landscaped areas within the development. More than 32% of the site is dedicated to these areas which exceeds the 30% zoning requirement.

g. Recreational Uses

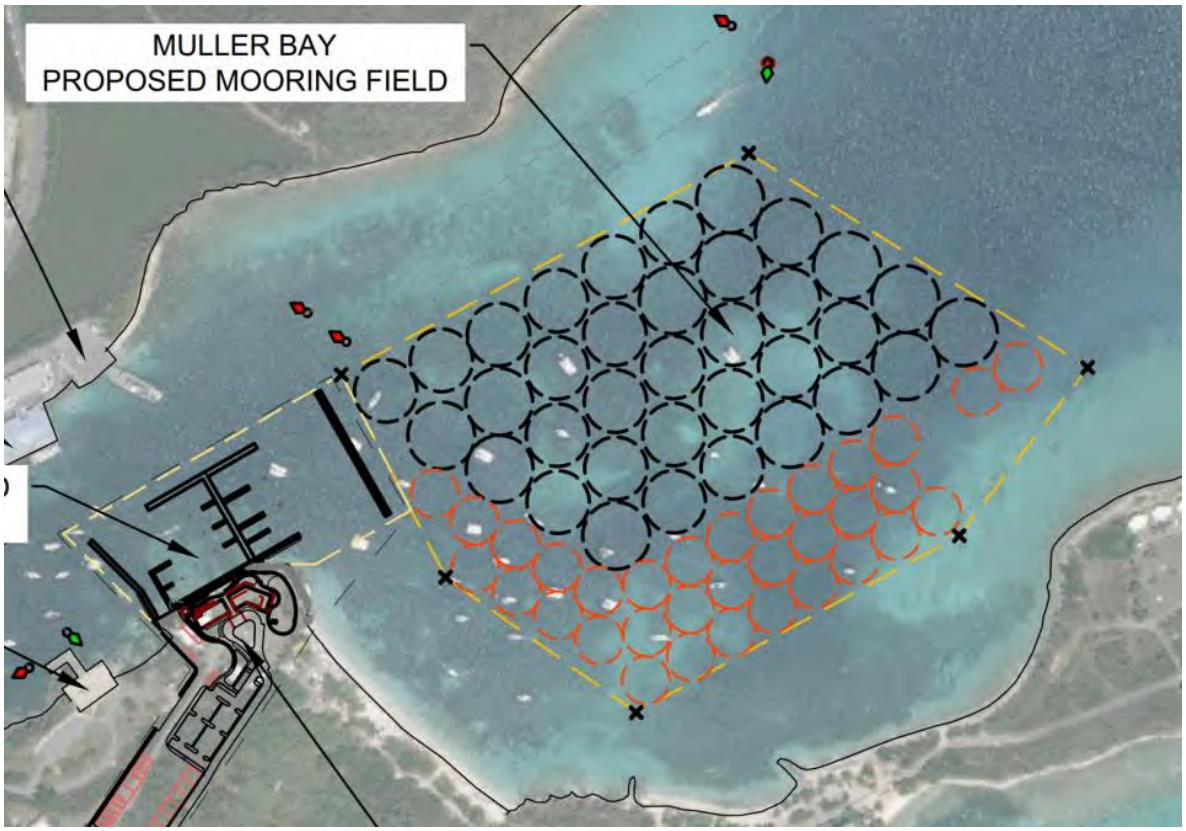
Latitude 18 does not propose industrial uses. Tropical Marine, Independence Boat Yard and East End Boat Service are all zoned W-1 Waterfront Pleasure. All of these are waterfront "pleasure" areas, used for recreation vessels, charter vessels and vessels used for fishing, diving and sightseeing. The Latitude 18 marina will not be used for commercial cargo delivery or industrial activities.

h. Mooring Field too Close to Beach

Moorings in the proposed mooring field will not be closer to the shoreline than existing moorings. The following diagram depicts the boats that were moored or anchored on December 15, 2022, within Vessup and Muller Bays.



As seen in the following figure, the moorings of the managed mooring field will not be as close to the beach as existing vessels are moored.



i. Beach Use Rights

Latitude 18 will do nothing to interfere with the right to lawfully use Vessup Beach currently possessed by neighboring landowners.

j. East Wind Access

Latitude 18 will respect East Wind Condominium's access to Vessup Beach and access to the condominium's wastewater system.

k. Privatization of Mooring Field

As previously noted, the Muller Bay Managed Mooring field proposed by Latitude 18 does not in any way deprive DPNR of its statutory jurisdiction to manage moorings. The area of the Muller Bay Mooring Field will be the subject of a lease of submerged lands between Latitude 18 and the GVI. Other managed mooring fields exist within the Territory and DPNR is not deprived of any supervisory authority within those fields. The rights and obligations of Latitude 18 will be spelled out in the lease and will not constrain DPNR's existing statutory authority.

The Red Hook neighborhood has never organized itself to offer management of the mooring fields in Vessup or Muller Bays, neither does the neighborhood have the facilities or the properties necessary to manage a mooring field. In order to properly manage a mooring field, there must be an area of dinghy access, pump out facilities, garbage facilities and areas for boaters who have vessels in the mooring field to park vehicles. These services will be provided by Latitude 18 and do not exist today.

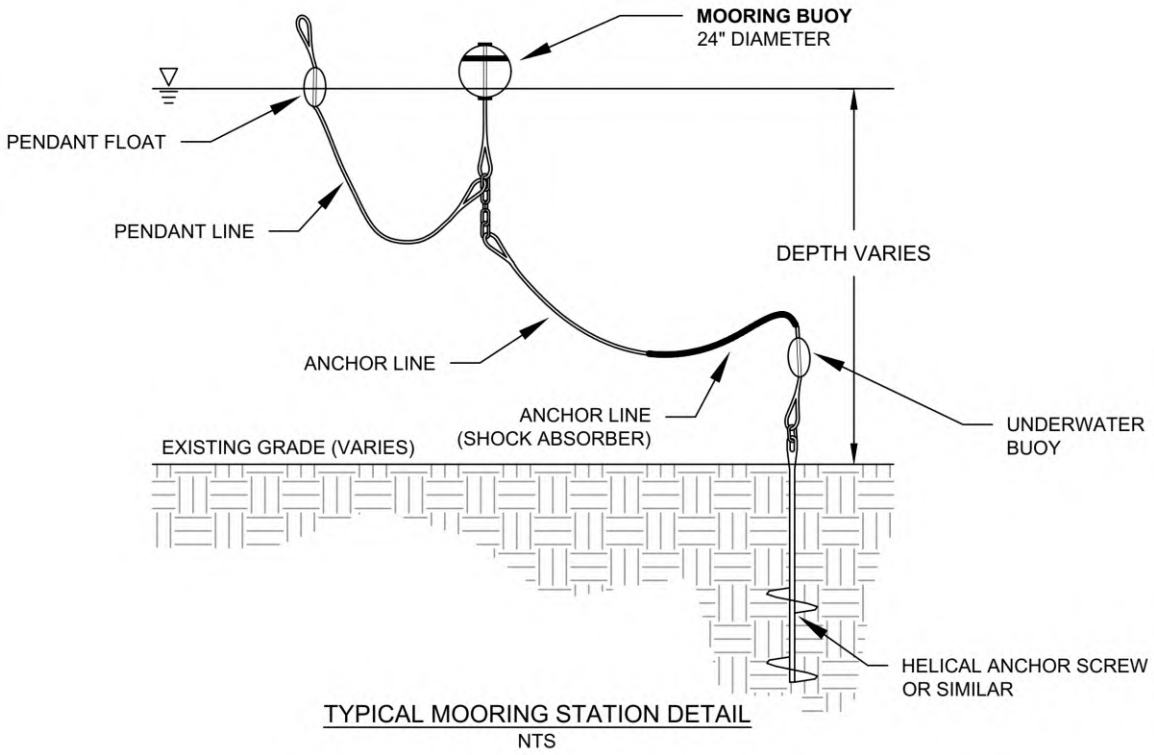
l. Cost of Mooring Field

Latitude 18 will establish a fee schedule for the services to be provided to boats using a mooring in the Muller Bay Managed Mooring Field. Those services will also be available to other boaters who wish to utilize the services that that will be available at Latitude 18. See also Exhibit B, Outline Latitude 18 Managed Mooring Fields.

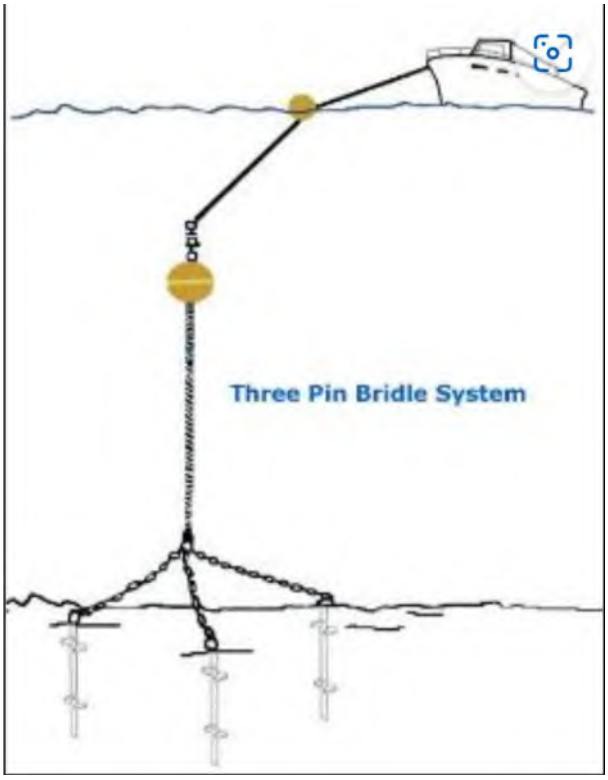
m. Installation of Mooring Tackle

Not all registered moorings are properly "environmentally" installed, nor are all the registered moorings properly installed for the size of the vessel attached to the mooring. In surveying the area, boats were found that used various objects as anchors, chains dragging on the seafloor, ropes dragging on the seafloor, and additional anchors and chains placed in addition to mooring screws.

An environmentally proper mooring consists of one or more helix/screw type anchors, with all associated tackle floating off the bottom. These can be chains with floats or ropes with floats or even floating line. When chains or ropes are allowed to rest on the seafloor every time, they move they scour the bottom and damage the submerged aquatic vegetation and corals or other hard bottom colonizers.



TYPICAL MOORING STATION DETAIL
NTS



Photographs of improperly installed moorings are found on Page 3 and 4.

n. Weather Concerns

Vessels should not stay in the open bay during major hurricanes. Vessels should move out of harm's way or into a hurricane hole designated by DPNR. Leaving a vessel in the mooring field not only poses a risk to the vessel but to other vessels and structures within the bay.

The Latitude 18 Managed Mooring Field will have safety and use regulations stating when vessels using the mooring field can remain, under what conditions and specify the equipment that can be safely used. The regulations also will specify the marine weather conditions in which the mooring field must be vacated.

o. Eviction Concerns

See Exhibit B.

Latitude 18 will be providing not only pump out facilities but also waste collection facilities for those who choose to use the services offered by Latitude 18. This will be of benefit to those who live aboard their vessels and should be having their wastewater pumped out and properly disposed.

p. Not to serve Mega Yachts

The project offers limited dockage to vessels up to 90ft. However, it is unlikely that vessels of that size will frequently utilize the marina, if ever. It is probable that vessel sizes will be comparable to vessels using the American Yacht Harbor located across the Bay. The size of vessels will most probably change during the year much like American Yacht harbor, Yacht Haven Grand, and Crown Bay Marina.

q. Access

Public Access to Dinghy Docks

Marinas typically do not allow free access for dinghy loading and unloading. American Yacht Harbor charges a drop off and pickup free and provides short term slip rentals. Crown Bay has a single slip dedicated to short-term dinghies which is intended primarily for access to restaurants and shops. Latitude 18 will provide similar public access for dinghies.

Charter Company Access

Latitude 18 contemplates agreements with the charter companies interested in the use of the Latitude 18 facilities.

Gas Dock

The fuel dock will have no impact on the National Park Service (NPS) dock. The NPS dock is more than 230ft southwest of the southwestern point of the Latitude 18 Marina and will have no impact on navigation to and from the NPS dock. The NPS has a defined channel and the Latitude 18 fuel dock and customers using it will not encroach on the NPS channel.

Fuel dock shown in reference to NPS dock on the left and current moorings avoiding the NPS Channel on right.

r. Pollution Concerns

In order to sell fuel, Latitude 18 will be Required to have a Terminal Facility License, which requires a Spill Prevention Countermeasure Control Plan (SPCC), and a required Facility Response Plan. These plans provide strict guidelines for reporting, equipment inspections and fuel spill supplies including booms. Operators and marina personnel will receive equipment and training. The marina will be required to have regular inspections, which must be documented. Releases, if they occur, most likely will be extremely minor related to boat fueling operations and trained personnel and supplies will be on hand to immediately cleanup and contain any release.

These plans will be developed as soon as Latitude 18 has received a CZM permit. In order to obtain a Terminal Facility License, the plans will be reviewed and updated frequently as a part of the license renewal process.

Dredging

Development of the maria will require the dredging of 7,600 cubic yards to a depth of -12ft. The dredging location is along the existing bulkhead and is shown in the marine drawings in Appendix A.

Dredging will be accomplished with a clam shell or dragline from the shoreline or may be dredged from a small offshore barge. Proper length turbidity barriers will be installed around all areas of work and discharge and a Water Quality Monitoring Plan will be implemented throughout all in-water work and with any work that has the potential to impact offshore water quality.

s. Upland Comments

Building Heights and Views

See earlier comments regarding the view field of East Wind Condominiums and Exhibit D.

The site is not an industrial park, and landscape is being placed to screen site activities from the nearest residential property. Fuel storage tanks will be placed unground in vaults so they will not be visible. See Plans in Supplemental Information Document.

Height Limitations W-1

In W-1 "No building shall exceed a height of three (3) stories." **The maximum building height on the site is 27' above grade.**

Proximity to Property Line

Latitude 18 has relocated the warehouse structure to 30' from its southwest property line to allow for a greater buffer from the shared property line with East Wind Condominiums than is required by the W-1 zone and proposes to bury the fuel tank in a concrete bunker structure to further distance upland structures from the shared East Wind Condominiums property line.

Odors from Utilities

The fuel tank is for storage, not a fueling station, and this will be buried in a concrete tank underground. The Wastewater Treatment Plant will be 100 feet or more from the property line shared with East Wind Condominiums as shown in the drawings in Appendix B. This will be a state-of-the-art wastewater treatment system. The plant will be required to get a TPDES permit and will be tested on a regular basis to ensure it is meeting treatment requirements.

Forklift and Constant Activity

Forklifts will only be used during daylight operating hours, and will be maintained in good condition with required mufflers to control sound. The operational

areas are more than 200ft from the nearest residential structures and landscaping between those structures and the operational areas will minimize noise impacts.

Fuel Storage

Latitude 18 has addressed this concern by amending the design to have the fuel storage buried below ground level in a concrete bunker structure with required exhaust and ventilation.

The construction of the fuel tank structures and the operation of the fuel tank once in service will follow all EPA guidelines and federal regulations for safety.

t. Road and Vehicular Access Comments

Destruction and Maintenance

Improvements will have to be made to Vessup Lane in order to access the site during construction and Latitude 18 will repair any damage it causes during construction so that access is not impacted. Once the development is complete, Latitude 18 will resurface and pave the entire roadway.

Latitude 18 will provide a maintenance plan for Vessup Lane during construction as a part of its application for a building permit from DPNR.

The Applicant will develop a long term maintenance plan for Vessup Lane to be implemented after the marina commences operation.

Access

The existing roadway is narrow, steep and winding, it is badly eroded and is encroached upon by vegetation. As stated above, improvements will have to be made in order to access the site during construction and Latitude 18 will repair any damage it causes during construction so that access is not adversely impacted. Once the development is complete, Latitude 18 will resurface and pave the entire roadway.

Traffic

A traffic plan will be developed during construction to ensure the safety of the neighborhood during deliveries of equipment, material and concrete.

Once in operation, most of the traffic to and from the site will be occurring during the day and on weekends when boating activities increase. Latitude 18 will be maintaining the roadway during construction and will resurface the entire roadway upon completion of the construction. This will improve traffic and driving conditions over the current conditions.

u. Economic Impact

Enclosed is an Economic Impact Analysis of the Latitude 18 marina development prepared by Haldene F. Davies PhD, former Vice President for Business Development and Innovation at the University of the Virgin Islands and now President of the University of the Commonwealth Caribbean.

The study found that overall, the construction of the Latitude 18 Marina and upland facilities is projected to generate $22 million in fiscal and economic impact

during construction of the marina and $196 million in fiscal and economic impact over the first 12 years of operation of the marina.

The development of the marina will restore an existing marina that has been in ruin for years and replace hurricane damaged buildings. The marina's redevelopment will help maintain the value of homes in the neighborhood.

Most of the businesses currently working on the redevelopment of the marina are local companies. And Latitude 18 is developing agreements with local businesses to operate within the marina complex.

Latitude 18 will not threaten the livelihoods of existing local businesses; it will in fact do the opposite by providing a larger customer base and restoring business opportunities that were lost when the old marina stopped operating.

v. Environmental Concerns

Terrestrial Wildlife Habitat

Prior to 1960 there was a large salt pond to the south and east of the marina site, which was filled with dredge material. The area still has piles of sand and there is still some piping associated with the dredging within the area. The soils throughout the filled area are sandy. The property reaches a maximum elevation of 10ft.

The marina was landscaped at one time, but the landscape has been significantly impacted by storm events and is no longer maintained. There are seagrapes (*Cocoloba uvifera*) found along the shoreline and scattered throughout the property. A large Norfolk pine (*Araucaria heterophylla*) in the center of the open yard has died due to the hurricanes of 2017 and a West Indian Almond (*Terminalia catappa*), which is doing poorly. Coconut palms (*Cocos nucifera*) are found along the northern shoreline of the marina. There are seaside maho (Thespesia populnea) intermixed with the seagrapes along the shoreline. Much of the marina site is either mown grass of compacted dirt or gravel. The area immediately around the buildings on the southeastern side of the property are overgrown with tan-tan (Leucaena leucocephala). Development of the old marina site will have limited impact on any native flora or fauna since the site has been and still is highly altered.

There is a fence separating the marina from the beach area to the southeast. The fence line is overgrown with seaside maho, seagrapes and capers (*Capparis indica*). The boat rental place which is only open on the weekend, has Hobi cats, kayaks, and small sail boats. Amid the trailers are extremely large seaside maho. There are also scattered seagrapes and coconut palms amid the trailers. The area becomes more forested to the west between the trailers and a beach access road and there are several marble trees, (*Cassine xylocarpa*) and a *Jacquinia arborea*, and very dense seaside maho. The beach extends to the southeast and there is a dirt roadway and then parking areas scattered between large seaside maho, seagrapes and scattered coconut trees. Scattered amid the parking areas and the trees were small patches of seaside lavender (*Argusia gnaphalodes*), beach peavine, and *Cakile lanceolata.* This area is impacted by man's use including parking cars under trees, leaving trash and removing vegetation. This area will not be impacted by the development of the marina.

Inland behind the littoral woodland is the old, filled wetland. Buttonwood mangroves (*Conocarpus erectus*) are found scattered within the area, some are quite large and extend above the surrounding canopy which is primarily tantan (*Leucaena leucocephala*), *Solanum sp*, crotons (*Croton* spp), sages (*Lantana* spp), smaller buttonwoods, widely scattered small casha (*Acacia tortuosa*), large *Acacia maracantha*, small *Cocoloba microstachya.* Vines are common in the old wetland including lizard food (Momordica charantia) and beach peavine (*Canavalia rosea*).

Along the existing roadway into the marina site, scattered throughout the wooded area in from the road and the dirt track to the beach are caper capers (Capparis cynophallophora, Capparis flexuosa, Capparis indica). Spanish bayonet (*Yucca aloifolia*) is common along the roadway and into the edge of the old wetland presumably having been dumped as landscaping debris as well as cactus (*Opuntia dillenii*). Turpinetine trees (*Bursera simaruba*) are found on the fence line of the existing marina and along the roadway. Wild cotton (*Gossypium hirsutum*) is found both along the roadside and in the old wetland area.

The areas of clearing are inland from the roadway, this will be removing primarily tan-tan, buttonwoods, casha, seagrapes, and other species that recolonized the old salt pond area when it was filled. Nearer the shoreline and along the roadway to the existing marina ruin are located seaside maho, turpentines, seagrapes, capers, wild cotton, and Spanish bayonets. Large trees will be preserved as part of the landscaping plan and tree boa corridor. The retention pond will be cleared for grading and then replanted with native species such as water mampoos, buttonwood mangroves and pigeon berry.

The property is within the designated critical habitat for the St. Thomas Tree Boa (*Epicrates monensis granti* recently reclassified as *Chilabothrus granti*), a federally listed rare and endangered species. Vegetation within the project footprint will be cleared by hand to limit impacts to the tree boas. A tree boa mitigation plan has been developed which follows the new Federal Fish and Wildife Tree Boa Biological Opinion and the Virgin Islands tree boa guidelines.

Deer tracks were noted in the old wetland area. Birds seen on the property outside the cleared marina area include Zenaida dove (*Zenaida aurita*), common ground dove *(Columbina passerina)* and a gray kingbird (*Tyrannus dominicensis*).

Reptiles were abundant and tree anoles (*Anolis cristatellus*), grass anoles (*Anolis pulchellus*), barred anoles (*Anolis stratulus*), dwarf geckos (*Thecadactylus* sp), and common ground lizards (*Sphaerodactylus macrolepis*) were seen within the property boundaries.

These animals will use the retention pond and it's surrounding areas that will be reforested.

Marine Habitats

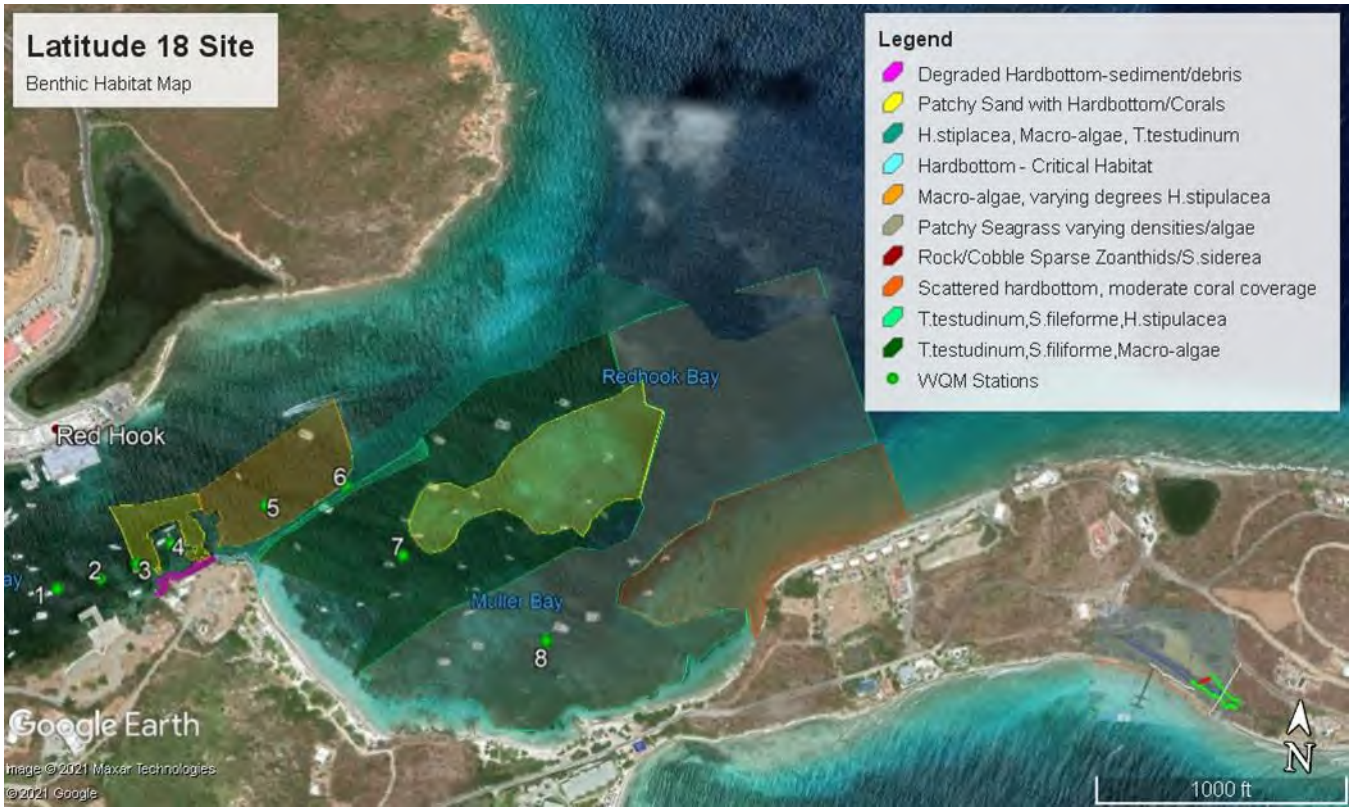
The project site lies within Red Hook Bay at the intersection of Vessup and Mueller Bay, due to the differences of exposure, circulation and use the water quality to the north of the project site is extremely different that the water quality to the east. Vessup Bay is a very narrow bay which extends just under 0.5miles

inland and is only 0.1mile at its widest. The discharge from the Vessup Bay WWTP is located at the very head of Vessup Bay. Vessup Bay is a heavily used by marine traffic, with marinas and docks and the VIPA Marine Terminal located immediately across the bay from the project site. The VIPA Terminal includes the landing and facility for passenger ferries transiting to St. John and the British Virgin Islands and the landing for car ferries from the island of St. John. Over the last few years Vessup Bay has been significantly impacted by Sargassum further impacting the water quality.

At the project site Red Hook Bay opens to 0.34 mile in width and Muller Bay is located to the east and has significantly more flushing than Vessup Bay and has significantly improved water quality. During surveys, the turbid plume from Vessup Bay was observed moving into or out of the marina area.

Vessup Bay is mangrove lined on the southern shoreline and while the bay used to have relatively large Thalassia testudinum and Syringodium filiforme beds the bay bottom is now dominated by the Halophila stipulacea and macro algae. Only small, scattered seagrass beds remain. Very few corals are found on hard substrates within Vessup Bay, on the VIPA terminal across the bay there are a very few small Diploria strigosa, S. siderea, S. radians and D. labyrinthiformis on the pilings.

Offshore bay supports seagrass beds composed of *Thalassia testudinum*, *Syringodium filiforme, Halodule beaudettei, Halophila decipiens* and more recently *Halophila stipulacea*. There are ESA listed coral species which occur on the reefs that fringe each side of the bay and the rocky promontories at Redhook Bay's entrance.



The project area is significantly impacted by the activities which occur within the bay, the boating, the marine vessel discharges, the debris from vessels, the suspension of vessels from propwash and vessels grounding and resuspending sediments and impacting bottom sediments and colonization. The area is also subject to high nutrients from the WWTP effluent discharge. There are however impacts that are the result of natural phenomena, not just the hurricanes, but the accumulation of Sargassum weed in the head of the bay. The weed accumulates blocking light to benthic organism and then later settles on them as the algae losses its floats and slowly sinks. All the shallows of the very inner bay have been impacted by the Sargassum.

In the areas shallower than 1' algae is the most abundant colonizer and *Enteromorpha flexuosa*, *Chaetomorpha sp., Neomeris annulata, Laurencia, Avrainvillea nigricans, Penicillus capitatus, Caulerpa, Acetabularia, Hypnea, Dictoya, Wrangelia*, and *Halimeda* are all present. *Caulerpa spp.* are probably the most abundant. These are scattered amid exposed patches of mud and areas of disturbance. *Halophila stipulacea* has become the most abundant deeper than 1' and covers larger areas than the algae did in shallower water. There are large uncolonized areas, many of which look as though they were the result of vessel activities. There are scattered pieces of debris and broken limbs throughout the Vessup bay. Near the fringing mangrove there are patches of *Thalassia testudinum*.

Marina Footprint and Wave Attenuator

The marina area is impacted by water quality and by the heavy marine activity which has occurred in Red Hook Bay over time. Offshore around the eastern portion of the old marina the area is a mix of sand and *H. stipulacea*. The pilings and debris which remain in the area are heavily algal colonized with sparse sponge colonization. The stone bulkhead is heavily algal colonized with very sparse corals, palythoas and sponges which are found on bulkhead and stones which have been broken loose from the wall. *Siderastrea siderea, Pseudodiploria strigosa, Zoanthus puchellus* and *Palythoa caribbaeorum* are found on the bulkhead and loose rocks. Millepora alcicornis is found on some of the larger debris and on some of the cables. *Monanchora unguifera, Desmapsamma anchorata,* and *Spirastrella spp*. are found on debris and pilings. *Caulerpa, Cladophora, Cladosiphon occidentalis Acanthophora, Penicillus, Halimeda, Dictyota*, *Laurencia, Hypnea* and *Cheatomorpha* are all present within the marina footprint.

Mooring field and Surrounding Area

There are vast seagrass beds within Muller Bay. The composition and densities of these beds vary with depth and disturbance. The seagrasses *Thalassia testudinum* is intermixed with *Syringodium filiforme* and a minimal amount *Halodule wrightii* can be found. There are some isolated areas where Syringodium is the dominant grass and others where *Thalassia* is the dominant grass. The invasive seagrass is most abundant to the north nearest the channel, but small areas of *H. stipulaceae* were found in the seagrass beds to the south. Found within these beds and within blowout areas are the algae *Caulerpa, Cladophora, Cladosiphon occidentalis Acanthophora, Penicillus, Halimeda, Dictyota, Laurencia, Hypnea* and *Cheatomorpha*. In the outer bay, the seagrass cover ranges between 20 to 100%

per meter squared and have blade densities of 17 to 444 blades per m*2*. In the inner bay the coverage is lower due to impact by mooring and anchoring vessels and the maximum coverage is between 30-40%. *Thalassia* is more prevalent in the shallower areas and *Syringodium* dominates at depth.

Towards the east exists a mixture of coral colonized cobbles and exposed broken pavement in the grass beds and *Orbicella spp*. and *Porites astreoides* are common.

Within Muller Bay there are areas of dense *Thalassia testudinum* colonization often mixed with *Syringodium filiforme* and areas of dense colonization by invasive *Halophila stipulacea.* Green algae (*Halimeda spp., Udotea spp., Penicillus capitatus*) abundant in seagrass. *Dictyota pulchella* abundant in bushy tangled clumps among seagrass and green algae species.

The construction of the marina expansion will impact the marine environment physically through the placement of piles and sheet piles and could impact water quality through siltation and turbidity during construction, dredging and de-watering of spoils. A water quality monitoring plan will be implemented to monitor control devices and to ensure repairs are made when necessary and additional measures are taken with installed devices are not effective.

The marina and wave attenuator will impact areas that are colonized by algae and Halophila stipulacea. The removal of the piling will result in the loss of encrusting sponges and the placement of the new sheetpile wall will impact 12 corals (*Psuedodiploria strigosa* and *Sidereastrea siderea*). The corals will be relocated as part of the mitigation for the project.

The marina will have a total of 302 pilings, 274 associated the dock structures, 12 mooring piles and 16 pilings associated with the travel lift. These will all disturb areas of algae and *H. stipulacea*. It is probable that each pile will disturb 1.5ft of seafloor due to wave turbulence.

The floating breakwater will be installed with helix anchors. As shown in the benthic habitat map Figure 6.06.8 Benthic Habitat in the Marina Area, the wave attenuator is in an area of Macro-algae and varying degrees H. stipulacea. As the attenuator will be anchored with helix anchors, it will have a negligible impact during installation, if blocks are placed it will have at most 700ft (0.016 acre) of algal/*H. stipulacea* impact (footprint and turbulence impact). The lines used will be elastic mooring rodes and will have no impact on the seafloor.

The attenuator is 16’ in width and is in approximately 30’ of water and is oriented in a north south orientation which means that during the course of the day the shading of the attenuator will shift, and the area of shading would shift throughout the day and should have no impact on the algae and *H. stipulacea* scattered within the area. No seagrass or corals will be impacted by this structure.

The dock will be providing slips for 28 vessels. The marina is designed so that vessels should have adequate depth for maneuvering and there should be minimal suspended sediment. The marina will have fuel service and the system is designed with secondary containment, double wall fuel lines and leak detection

systems. The marina will have a Terminal Facility License and a Spill Prevention Containment Countermeasure Plan. Fuel supplies will be situated at the main docks as well as on the dinghy dock in the event of inadvertent spills. Fueling of dinghies on the dinghy dock or in the managed mooring field will be prohibited.

No discharge from vessels at the marina or in the managed mooring field will be allowed and the marina will have a pump out facility.

The moorings have been sited to avoid all hardbottom and corals. Some of the mornings will be in areas of mixed seagrass, and in areas with *H. stipulacea* and algae. The moorings will utilize helix type anchors and floating lines so there will be minimal impact on seagrasses after the moorings are installed. There may be some blade and rhizome loss during installation. Seagrass currently is thriving in the outer bay under vessels in the bay where ropes and anchors are not impacting the seafloor.

The implementation of the managed mooring field with proper moorings with float lines and the cleanup of the debris from the seafloor will allow for the recolonization of the damaged areas by sea grasses. Unfortunately, due to the presence of *H. stipulaceae* it may colonize many of the areas which are cleared or no longer swept by lines before *T. testudinum, S. filiforme* or *H. wrightii* can spread into the area.

Vessels are currently moored haphazardly through Vessup and Muller Bay. Many have anchoring systems that are damaging the seafloor as shown in photographs on pages 3 and 4. Some of the moorings are occupied by live-a-boards and with the lack of a pump-out facility those vessels could be dumping their waste straight into the sea. Some vessels have been allowed to sink on their moorings.

The introduction of a managed mooring field will not only stop many of the ongoing physically damaging activities that are occurring, but it should also help reduce the nutrient loading by providing pump out service and enforcing a pump-out requirement in the managed mooring field.

Current State of the Bay

Photographs in the Environmental Assessment Report and some provided in this document show the current condition of the seafloor and ongoing impacts due to existing uses. Impacts to the seafloor are the result of man's use of the area.

Latitude 18 is by no means saying that all boaters are responsible for the adverse environmental impacts that have occurred, but even those boaters who take care and try to minimize their footprint have an impact, whether it be from the impact of boat exhaust or the accidental loss of a towel or hat overboard that sinks to the sea bottom and ends up smothering seagrasses or corals.

Existing water quality in Vessup Bay is poor and it is listed as Impaired Waters under CWA Section 303(d).

Water exchange is very weak and highly dependent on wind conditions to force circulation and improve mixing, as tidal flows are extremely low.

Based on the calibrated circulation model implemented by ATM for Vessup Bay, water exchange under average wind conditions is less than 75% in 10 days. Exchange improves to 90% in 9 days for the high wind conditions but decreases to 40% in 10 days for low wind conditions.

In addition to poor circulation, Vessup Bay receives pollutant discharges, including a public WWTP and has no enforceable management of discharges by many of the boats anchored in the bay.

Water circulation improves in Muller Bay due to increased mixing and better circulation given the larger water body and positive influence of wind-driven mixing.

The marina location in Vessup point is at the transition between the poorly flushed Vessup Bay and the better-mixed waters of Muller Bay.

The change in water quality is visible in the data collected overtime across the site. Turbidities are higher farther into Vessup Bay and dissolved oxygen is lower. Water quality shifts across the site with the changing tides.

Water quality in the bay is significantly impacted by discharge of wastewater influent from the public WWTP at the head of the bay, introduction of hydrocarbons from vessels, and vessel exhaust, discharge of bilge water, discharge of wastewater, and seafloor disturbance whether by anchors or dragging lines or propwash. The limited circulation in inner Vessup Bay compounds the issue. The poor water quality in the bay has been exacerbated by man's poor practices which are continuing.

Some members of the public stated that the pollutants are not their fault; no one is polluting, that it is the landowner's responsibility to clean up the seabed not the mooring field residents, and that Latitude 18 has no regard for the environment. Latitude 18 disagrees with these allegations and thinks DPNR will agree that Red Hook Bay is not being managed, maintained, and protected as it should. This project, with the help of DPNR and VIPCA, aims to improve the

environment and reduce the adverse impact humans are having on our natural resources.

Pollutants and Contaminants

Latitude 18 will be taking measures to control and abate all potential pollutants and contaminants that have the potential to impact the terrestrial and marine environment. All runoff from areas with the potential to come in contact with releases of hydrocarbons will be directed through an oil-water separator before being discharged into the retention pond where further treatment, i.e. settling of sediment and uptake of nutrients will occur. The fueling operation will obtain all required permits and will have a Spill Prevention Countermeasure and Control Plan and will have fuel supplies on hand at all times and personnel will be trained to address releases. Any used oil, batteries or other potentially hazardous materials will be properly stored and disposed of at the appropriate licensed facility. All boats, large and small, will be required to follow marine and mooring field guidelines and will not be allowed to dump waste, and will be provided with services such as pumpout and waste disposal. The project will have a Wastewater Treatment plant which will monitor effluent will be used to irrigate landscaping to make sure it will thrive. The project will have a reverse osmosis plant and its discharge will be into the riprap along the site, and the stormwater outfall will be of water which has gone through an oil water separator and a retention pond and will be of better quality that is currently discharged from the site.

Please do not hesitate to contact us if you have any question or concerns at bioimpact@islands.vi.

Respectfully submitted,

Amy Claire Dempsey, M.A.

President, Bioimpact, Inc.

EXHIBIT A

St. Thomas
U.S. Virgin Islands

PROJECT LOCATION

NOTE:

1. BASEMAP SOURCE: USGS 2013 CRUZ BAY QUADRANGLE TOPO MAP

N

0 3000

Scale in Feet

ATM
A Geosyntec Company
2047 Vista Parkway, Suite 201
West Palm Beach, FL 33411
(561) 659-0041
Certificate of Authorization #4669

LOCATION PLAN

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

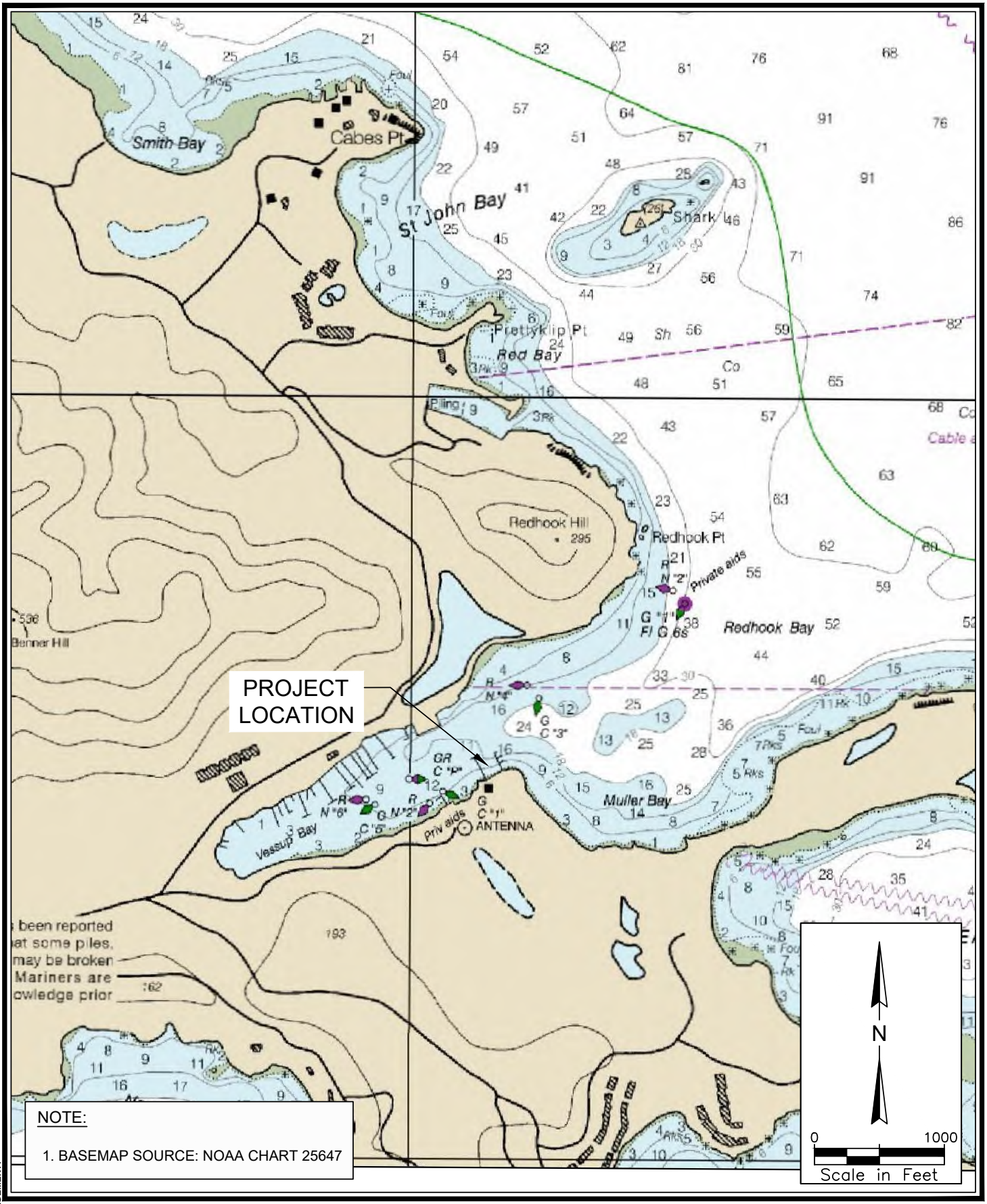
Sheet Number: 1 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTE:

1. BASEMAP SOURCE: NOAA CHART 25647

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West Palm Beach, FL 33411
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NAVIGATION PLAN

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

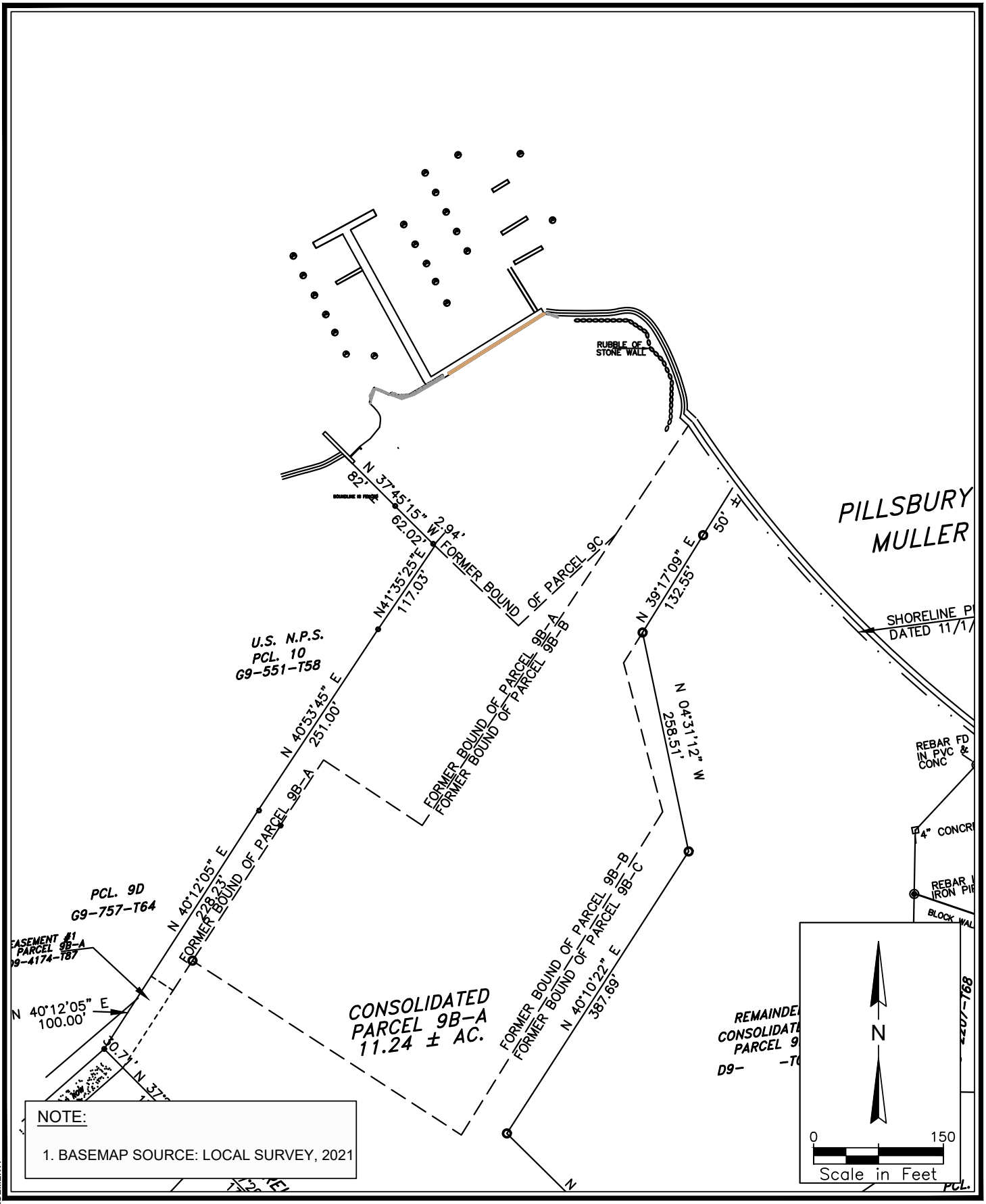
Sheet Number: 2 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTE:

1. BASEMAP SOURCE: LOCAL SURVEY, 2021

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West Palm Beach, FL 33411
(561) 659-0041
Certificate of Authorization #4669

PARCEL MAP

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

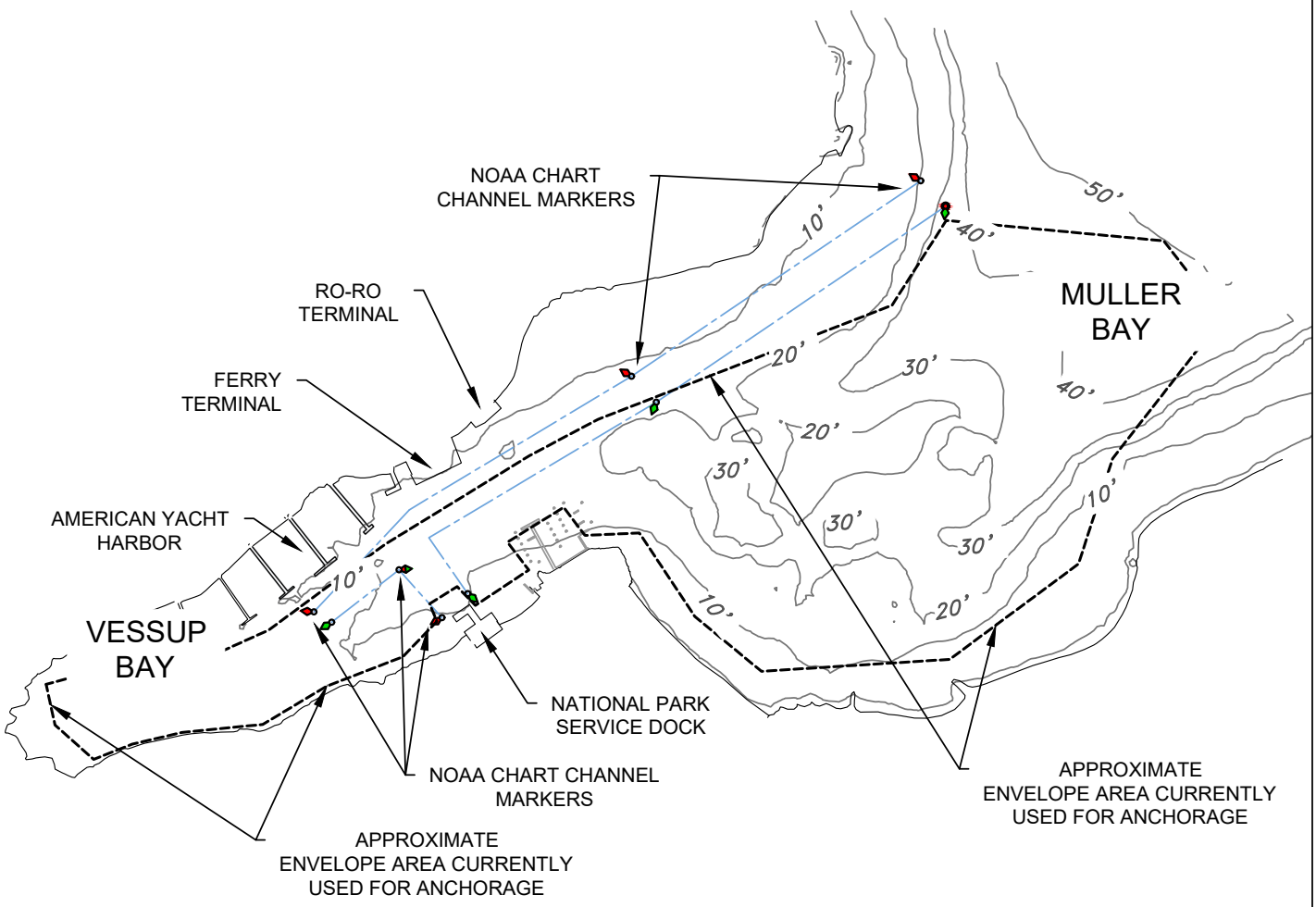
Sheet Number: 3 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

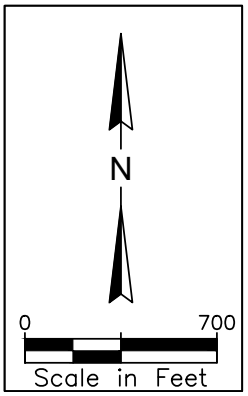
Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTES:

1. BARHYMETRY SOURCE: NOAA NATIONAL OCEAN SERVICE 2011 LiDAR
2. APPROXIMATE EXISTING ANCHORAGE BOUNDARIES BASED ON AERIALS IMAGERY.
3. VERTICAL DATUM: LOCAL MEAN LOWER LOW WATER
4. HORIZONTAL DATUM: NAD83 PUERTO RICO AND VIRGIN ISLANDS, US FOOT
5. MHHW ELEVATION: +0.57 ft, MSL
6. MLLW ELEVATION: -0.52 ft, MSL



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Certificate of Authorization #4669

EXISTING CONDITIONS
VESSUP & MULLER BAY

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

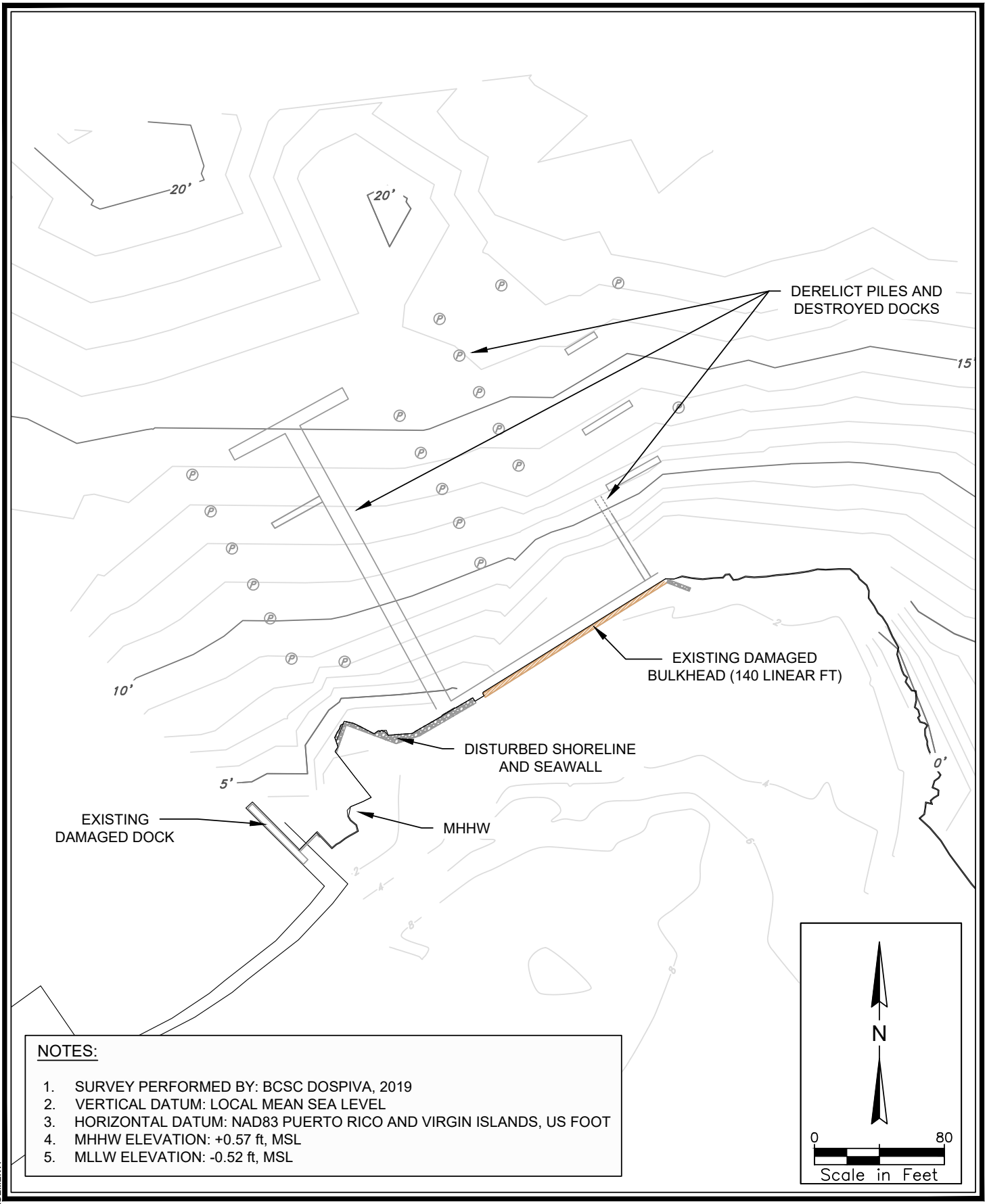
Sheet Number: 4 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTES:

1. SURVEY PERFORMED BY: BCSC DOSPIVA, 2019
2. VERTICAL DATUM: LOCAL MEAN SEA LEVEL
3. HORIZONTAL DATUM: NAD83 PUERTO RICO AND VIRGIN ISLANDS, US FOOT
4. MHHW ELEVATION: +0.57 ft, MSL
5. MLLW ELEVATION: -0.52 ft, MSL

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West Palm Beach, FL 33411
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Certificate of Authorization #4669

SITE EXISTING CONDITIONS

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

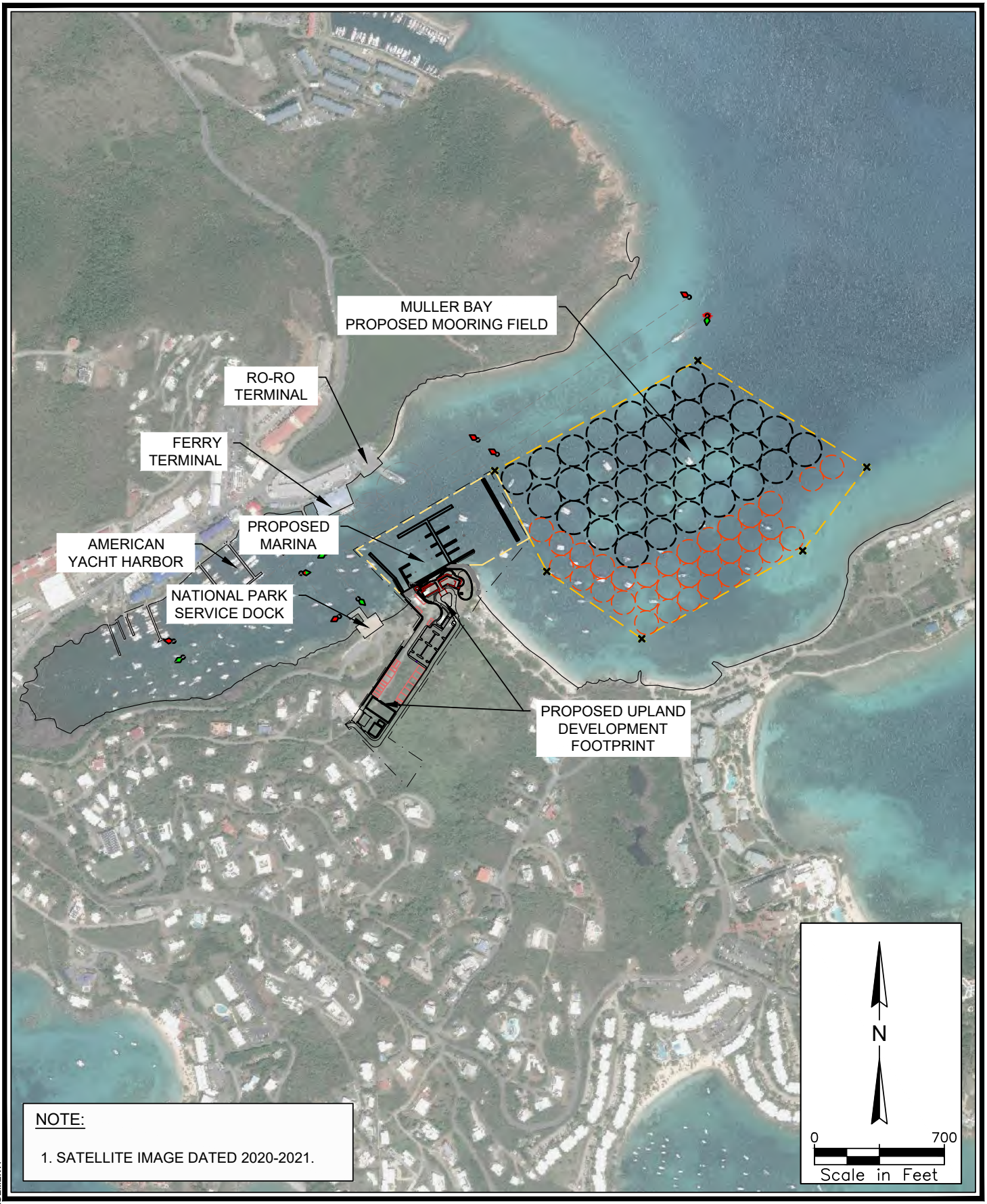
Sheet Number: 5 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTE:

1. SATELLITE IMAGE DATED 2020-2021.

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PROJECT COMPONENTS

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

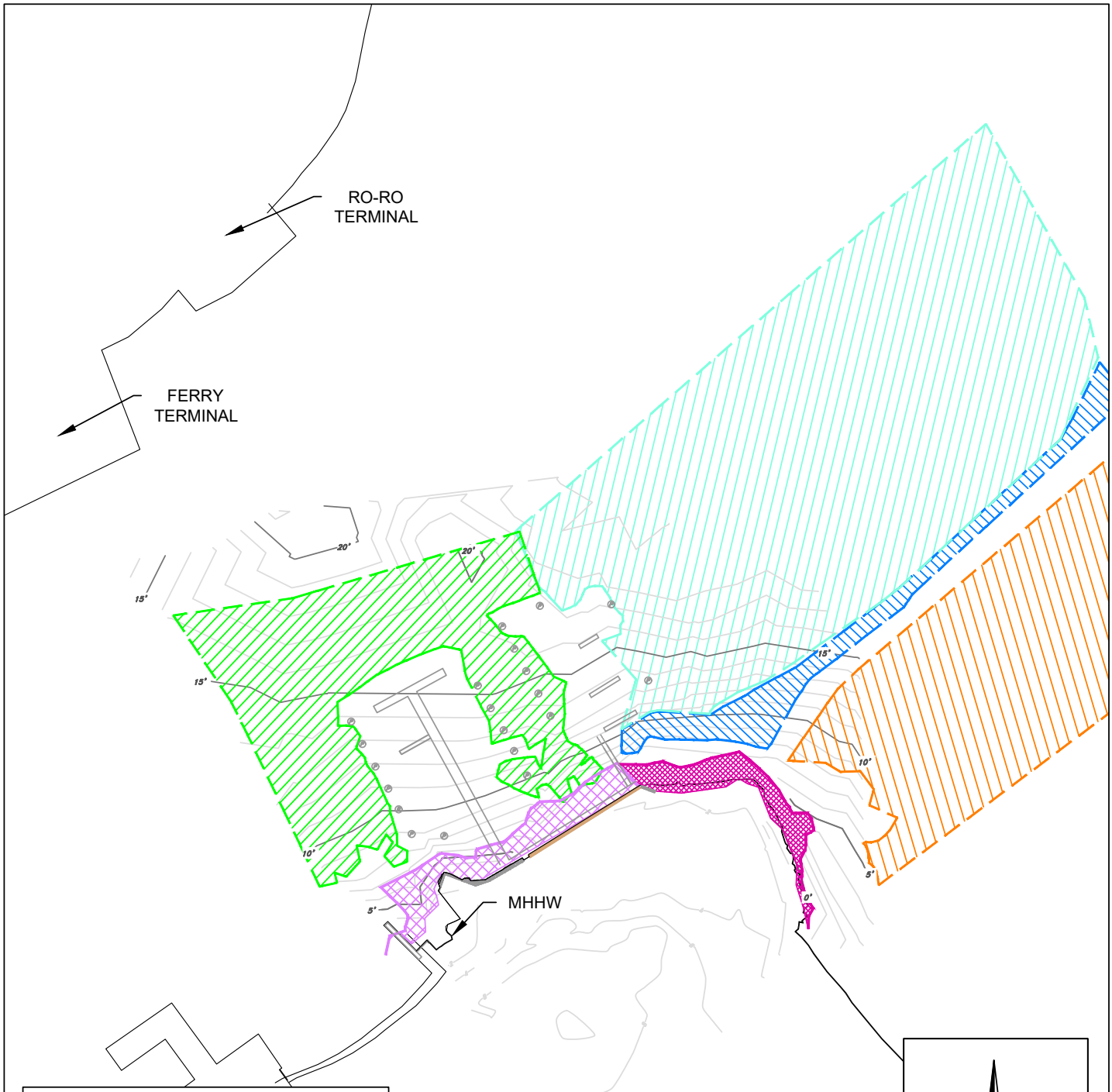
Sheet Number: 6 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTES:

1. SEE SHEET 5 FOR SURVEY NOTES
2. BENTHIC HABITAT SURVEY SOURCE: BIOIMPACT, 2019

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EXISTING BENTHIC HABITAT MARINA SITE

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 7 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

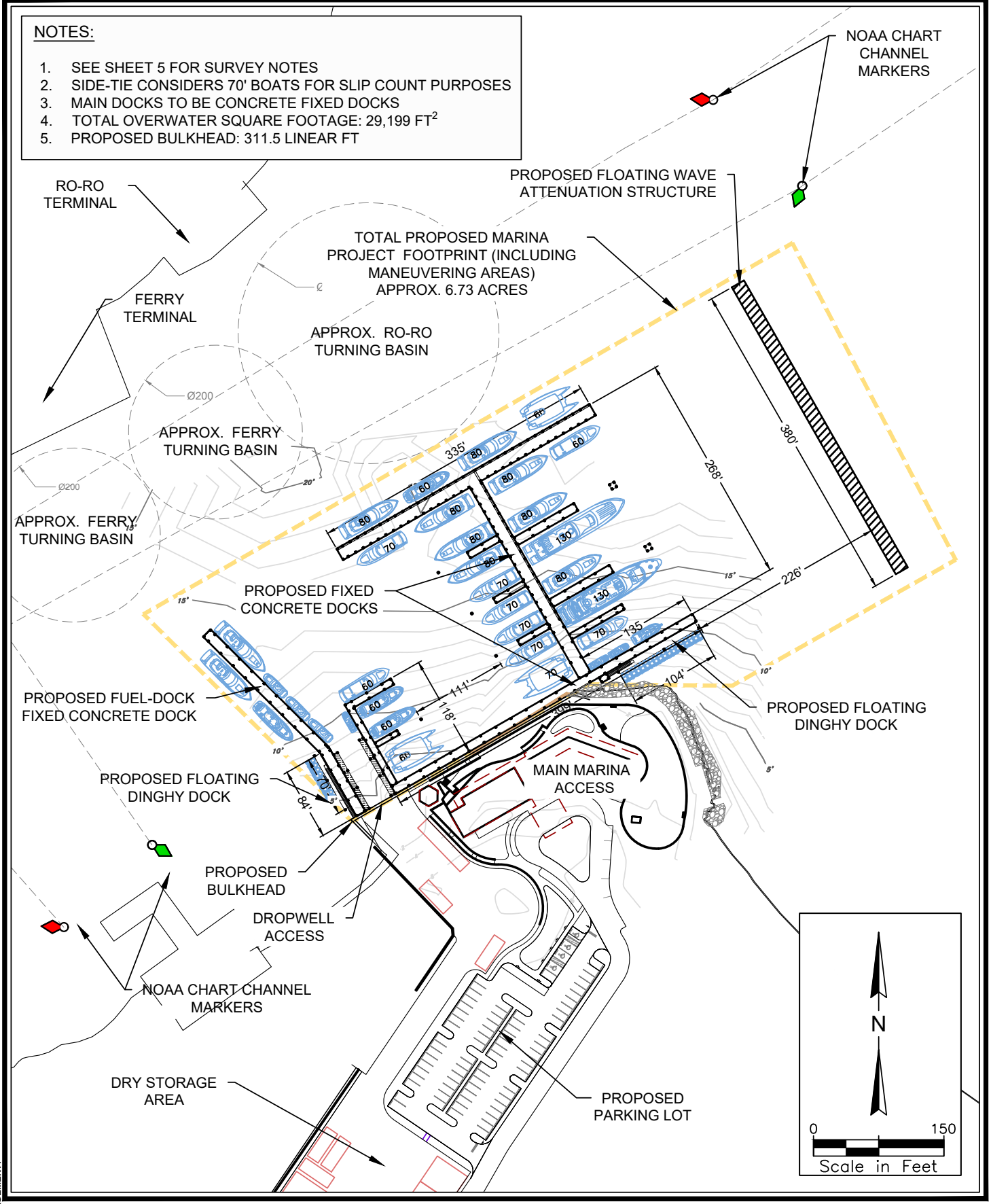
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

NOTES:

1. SEE SHEET 5 FOR SURVEY NOTES
2. SIDE-TIE CONSIDERS 70' BOATS FOR SLIP COUNT PURPOSES
3. MAIN DOCKS TO BE CONCRETE FIXED DOCKS
4. TOTAL OVERWATER SQUARE FOOTAGE: 29,199 FT^2
5. PROPOSED BULKHEAD: 311.5 LINEAR FT



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OVERALL PROPOSED PLAN MARINA

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

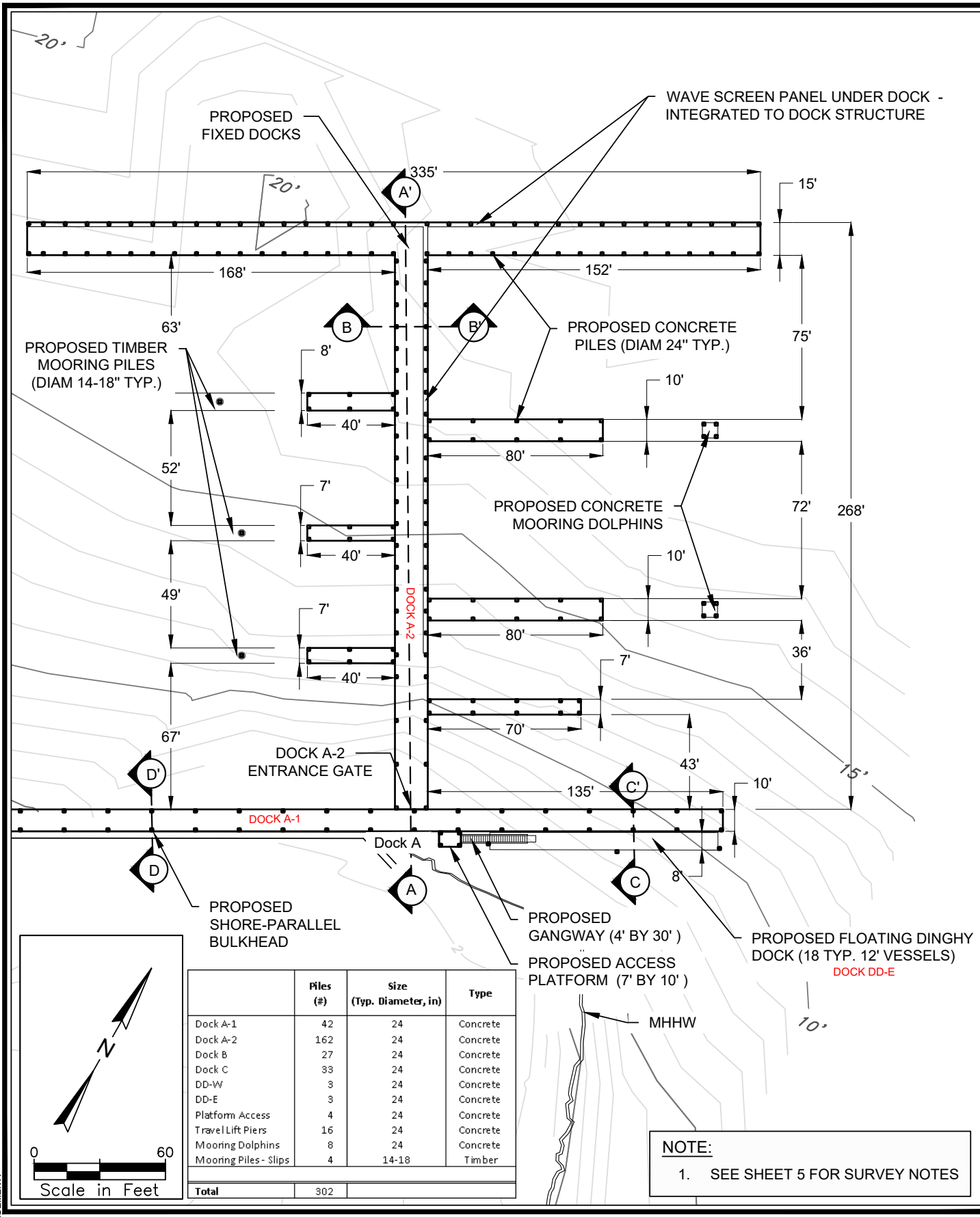
Sheet Number: 8 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



	Piles (#)	Size (Typ. Diameter, in)	Type
Dock A-1	42	24	Concrete
Dock A-2	162	24	Concrete
Dock B	27	24	Concrete
Dock C	33	24	Concrete
DD-W	3	24	Concrete
DD-E	3	24	Concrete
Platform Access	4	24	Concrete
Travel Lift Piers	16	24	Concrete
Mooring Dolphins	8	24	Concrete
Mooring Piles - Slips	4	14-18	Timber
Total	302		

NOTE:

1. SEE SHEET 5 FOR SURVEY NOTES

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PROPOSED DOCKS A PLAN

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 9 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

DIEGO.DELGADOTAMAR@GATION G:\WESTPALMBEACH SHARES\DRAWINGS\PROJECTS\19-3374 VI VESSUP POINT MARINA FEASIBILITY NDA\X\PERMIT\VESSUP ATM\SUPPORT AUG2022\ATM LATITUDEMARINA PERMITSET 16DEC22.DWG

	Piles (#)	Size (Typ. Diameter, in)	Type
Dock A-1	42	24	Concrete
Dock A-2	162	24	Concrete
Dock B	27	24	Concrete
Dock C	33	24	Concrete
DD-W	3	24	Concrete
DD-E	3	24	Concrete
Platform Access	4	24	Concrete
Travel Lift Piers	16	24	Concrete
Mooring Dolphins	8	24	Concrete
Mooring Piles - Slips	4	14-18	Timber
Total	302		

PROPOSED FIXED DOCKS

TURBIDITY CURTAIN TO ENCIRCLE ACTIVE WORK AREA (TYP.) , CURTAIN SHALL BE MOVED AS WORK PROGRESSES

15'

12'

190'

10'

DOCK C

PROPOSED TIMBER MOORING PILES (DIAM 14-18" TYP.)

PROPOSED CONCRETE PILES (DIAM 24" TYP.)

61'

8'

DOCK B

47'

6'

FUEL DOCK ENTRANCE GATE

8'

PROPOSED GANGWAY ADA COMPLIENT (4' BY 66')

6'

70'

84'

75'

5'

DOCK B ENTRANCE GATE

47'

PROPOSED FLOATING DINGHY DOCK (12 TYP. 12' VESSELS)

DOCK DD-W

DOCK A-1

PROPOSED FILL AREA

DRY-STORAGE DROPWELL

PROPOSED SHORE-PARALLEL BULKHEAD

MHHW

N

0 60

Scale in Feet

NOTE:

1. SEE SHEET 5 FOR SURVEY NOTES

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PROPOSED DOCK B & C

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

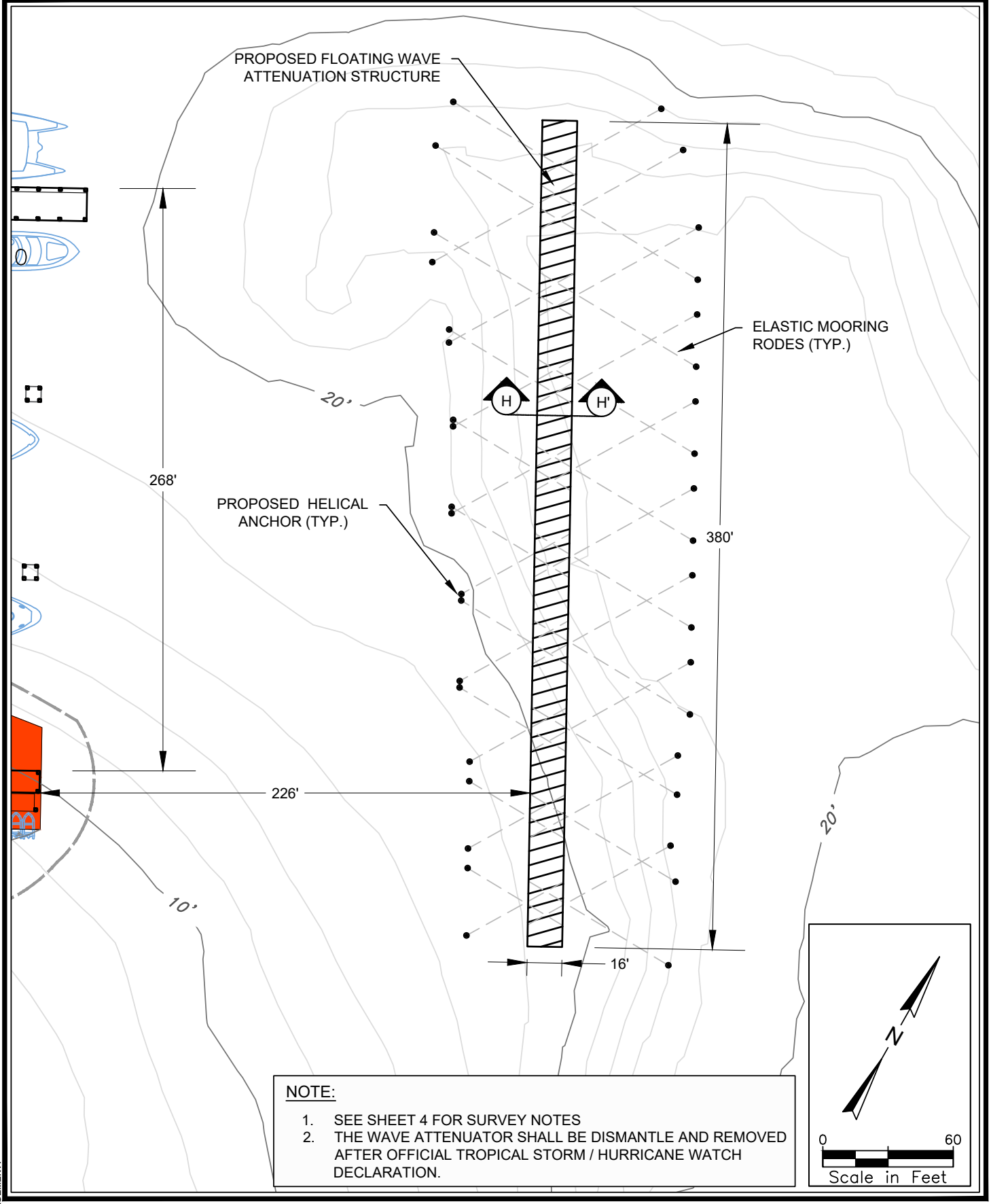
Sheet Number: 10 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTE:

1. SEE SHEET 4 FOR SURVEY NOTES
2. THE WAVE ATTENUATOR SHALL BE DISMANTLE AND REMOVED AFTER OFFICIAL TROPICAL STORM / HURRICANE WATCH DECLARATION.

DIEGO.DELGADO\AMARGOATION G:\WESTPALMBEACH SHARES\DRAWINGS\PROJECTS\19-3374 VI VESSUP POINT MARINA FEASIBILITY NDA\X\PERMIT\VESSUP ATM\SUPPORT AUG2022\ATM LATITUDEMARINA PERMITSET 16DEC22.DWG

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PROPOSED WAVE ATTENUATOR

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

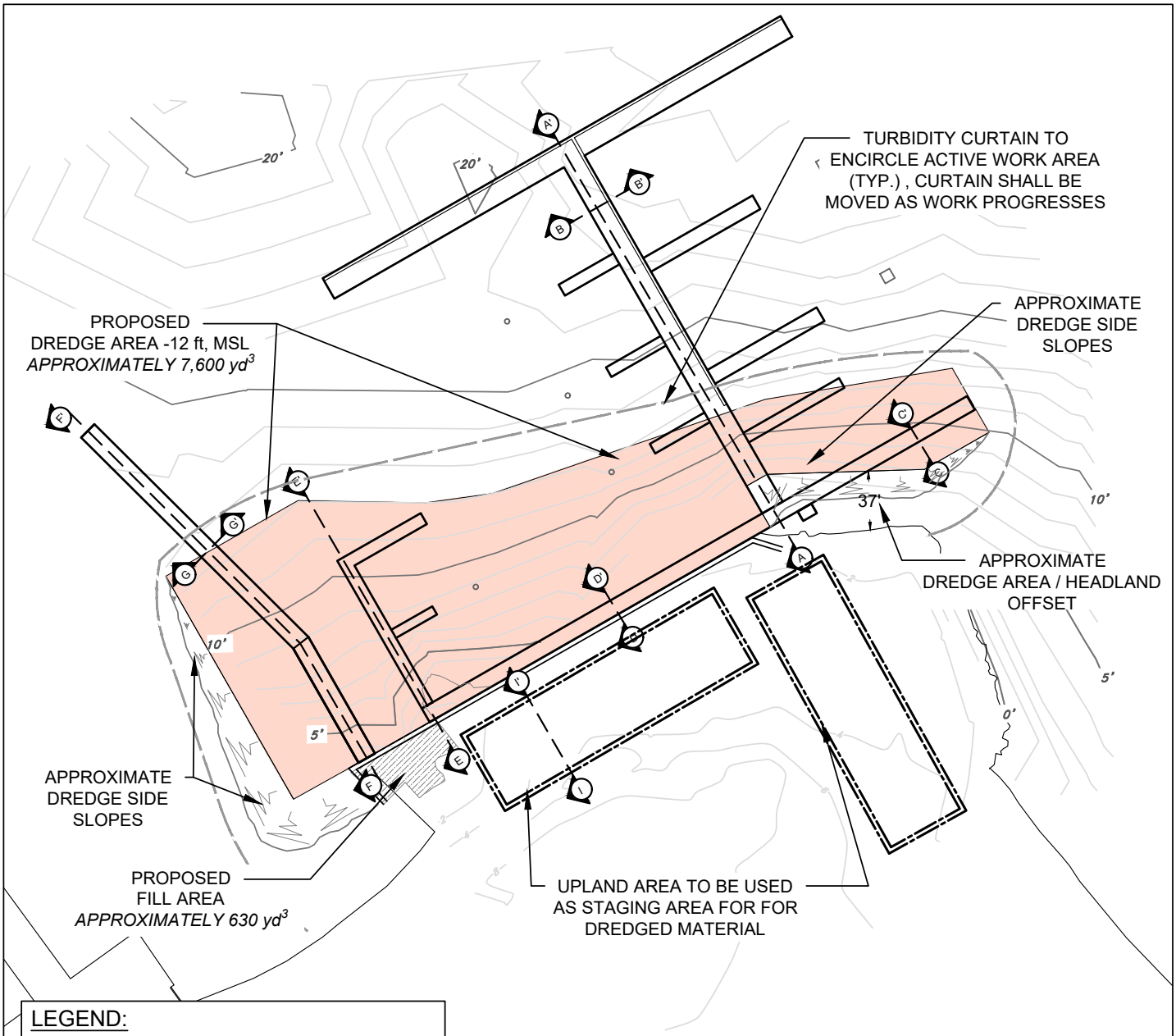
Sheet Number: 11 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



LEGEND:

- PROPOSED DREDGE AREA (-12 ft, MSL)
- PROPOSED UPLAND FILL AREA

NOTES:

1. SEE SHEET 5 FOR SURVEY NOTES
2. DREDGED MATERIAL DEWATERING WILL BE ON-SITE AND CONTAINED IN ACCORDANCE WITH REGULATORY PERMITS (SEE SHEET 13 FOR TYPICAL DEWATERING AREA CROSS SECTION).
3. DEWATERING DRAINAGE COULD BE MANAGED TO RUN BACK INTO LOCAL WATER BODY.
4. DRAINED MATERIAL WILL BE HAULED BY TRUCK TO AN APPROVED LONG-TERM LOCATION.
5. APPROXIMATE DREDGE MATERIAL VOLUME 7,600 yd3

N

0 100

Scale in Feet

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OVERALL PROPOSED DREDGING PLAN

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 12 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

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SECTION I
TYPICAL CONTAINMENT AREA

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

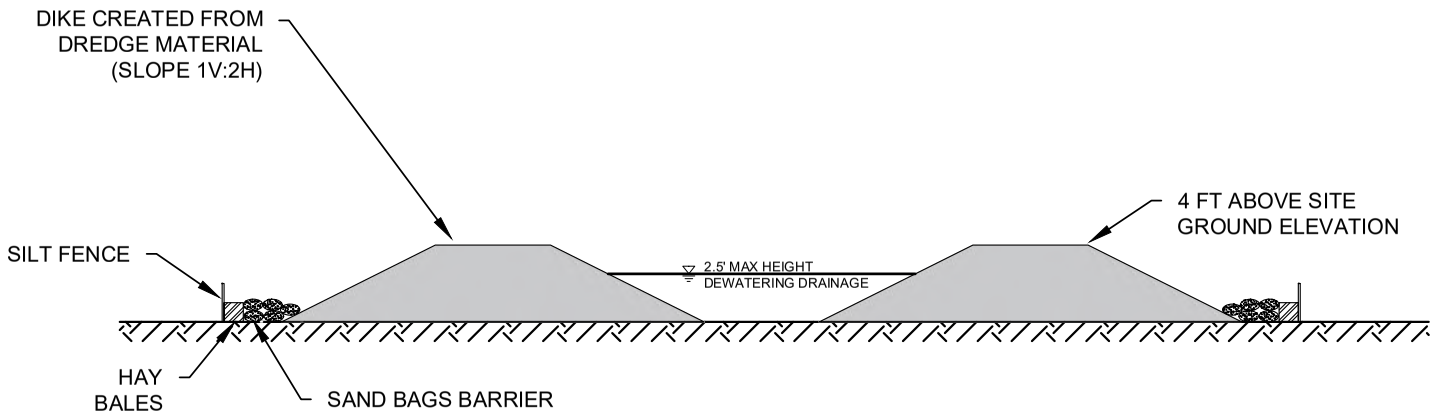
Sheet Number: 13 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



TYPICAL CONTAINMENT AREA
SECTION I-I' 1"=10'

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LATITUDE 18 MARINA

SECTION A & B

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

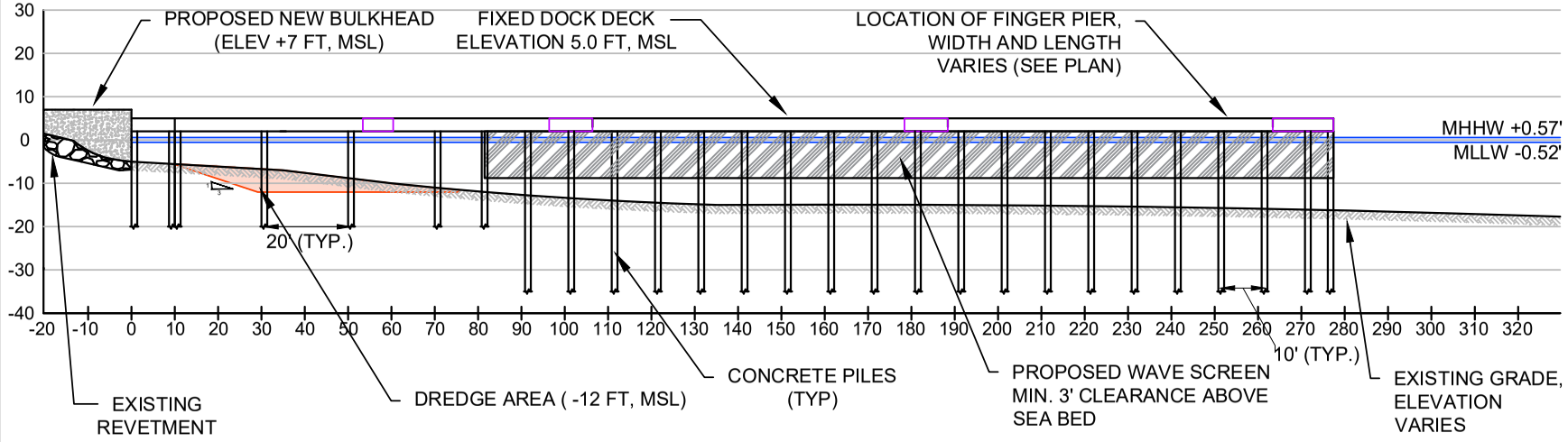
Sheet Number: 14 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

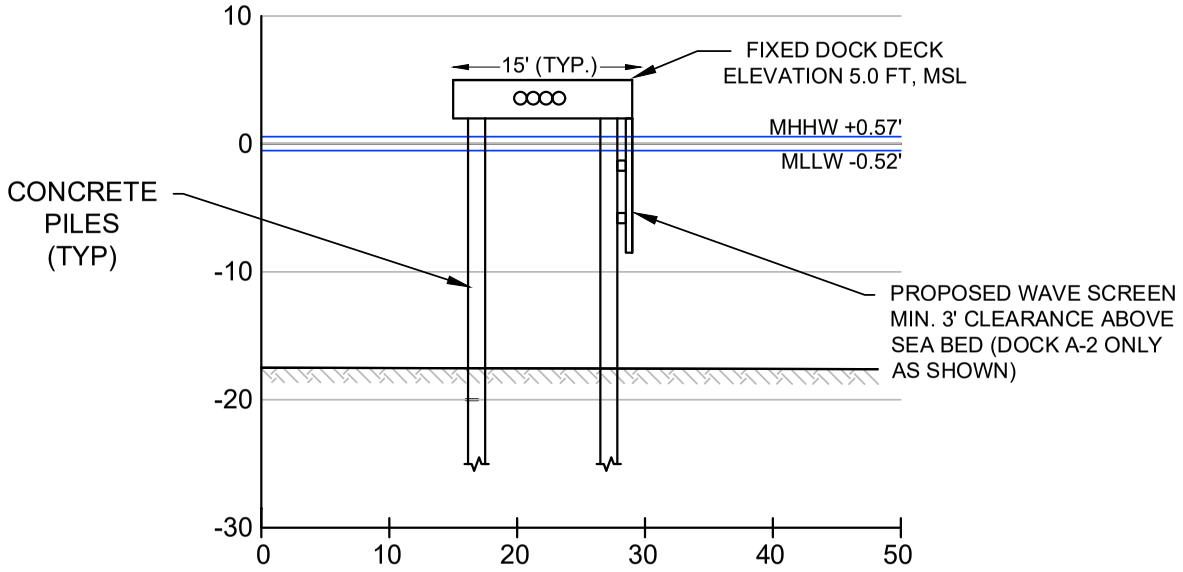
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



FIXED DOCK A-2
SECTION A-A' 1"=40'



DOCK SECTION (TYPICAL)
SECTION B-B' 1"=15'

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LATITUDE 18 MARINA

SECTION C & D

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

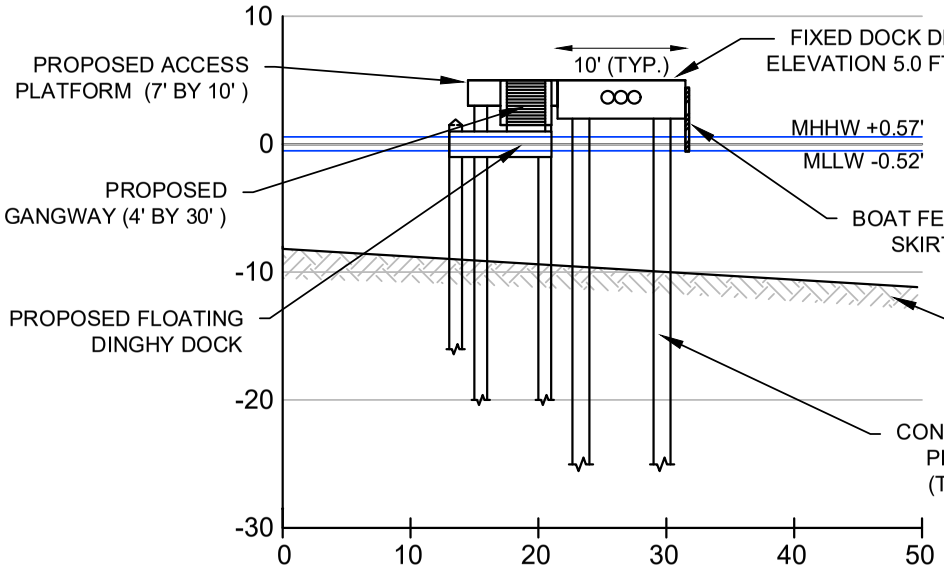
Sheet Number: 15 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

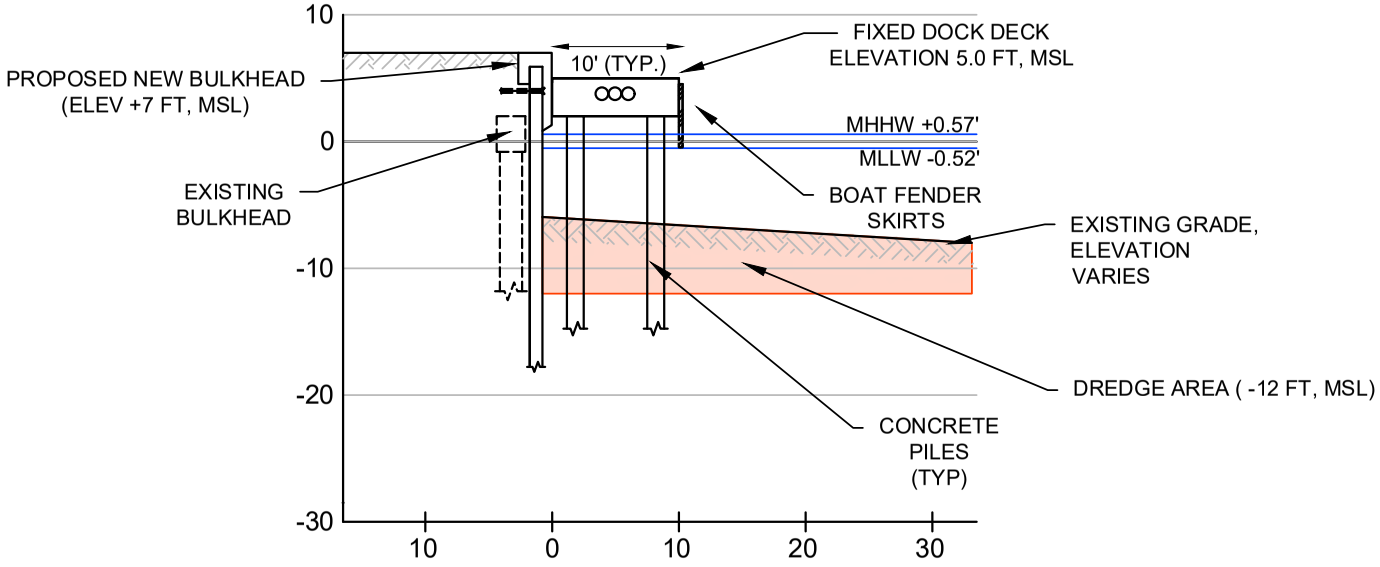
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



FIXED DOCK A-1
SECTION C-C' 1"=15'



FIXED DOCK A-1
SECTION D-D' 1"=15'

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LATITUDE 18 MARINA

SECTION E

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

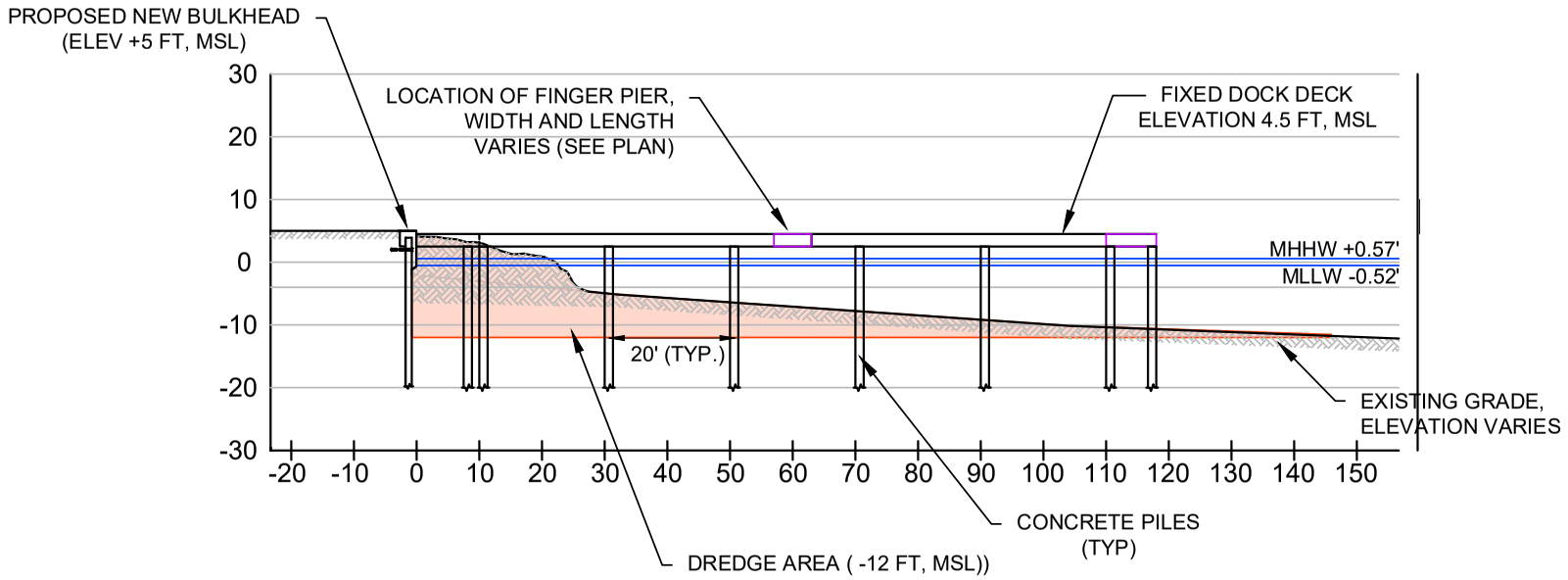
Sheet Number: 16 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



FIXED DOCK B
SECTION E-E' 1"=30'

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LATITUDE 18 MARINA

SECTION F & G

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

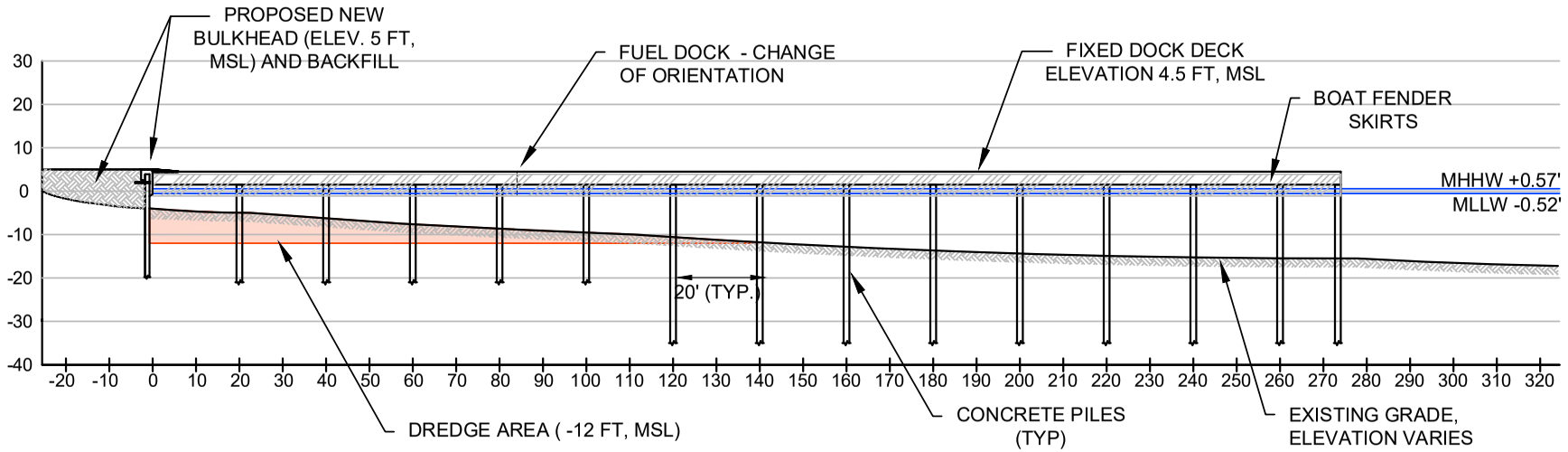
Sheet Number: 17 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

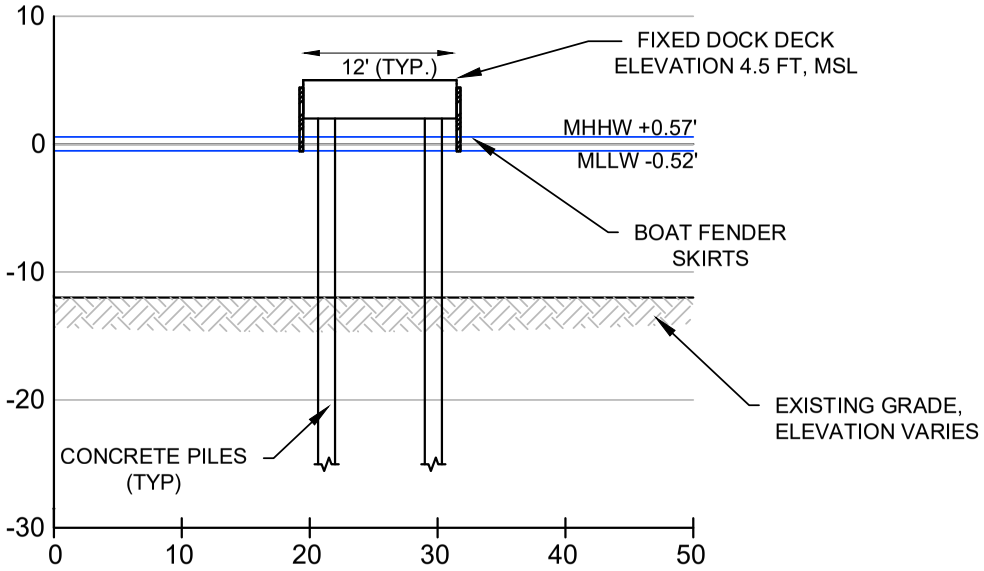
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



FIXED DOCK C
SECTION F-F' 1"=40'



FIXED DOCK C
SECTION G-G' 1"=15'

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SECTION H
WAVE ATTENUATOR

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

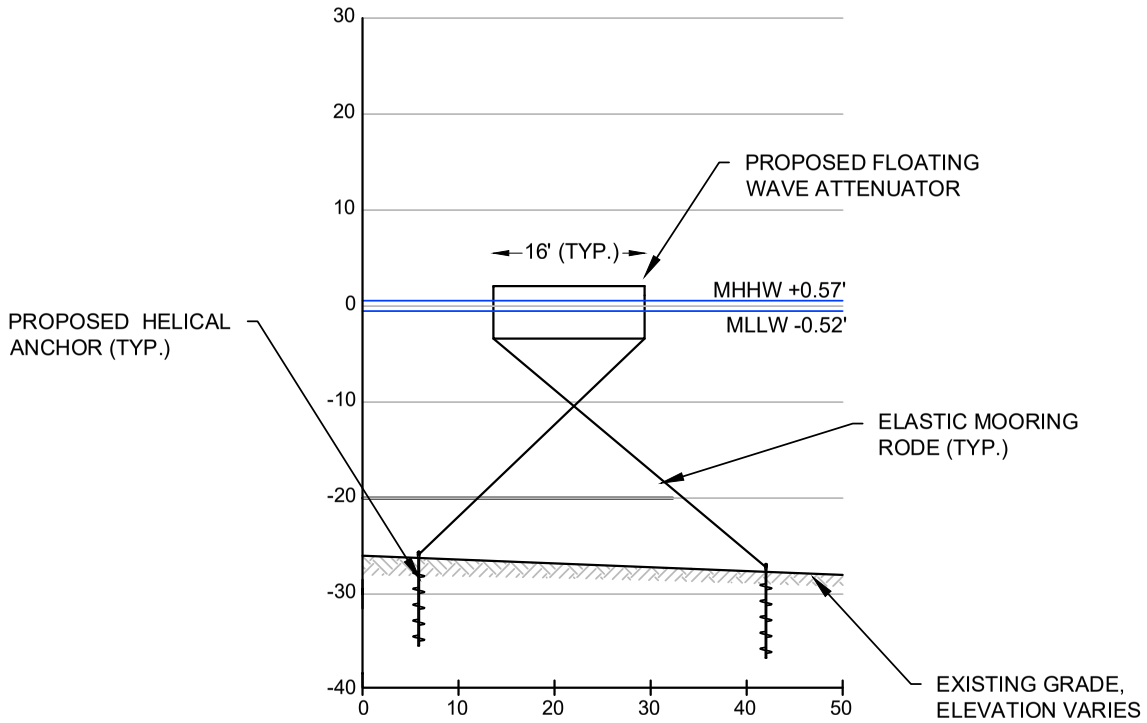
Sheet Number: 18 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

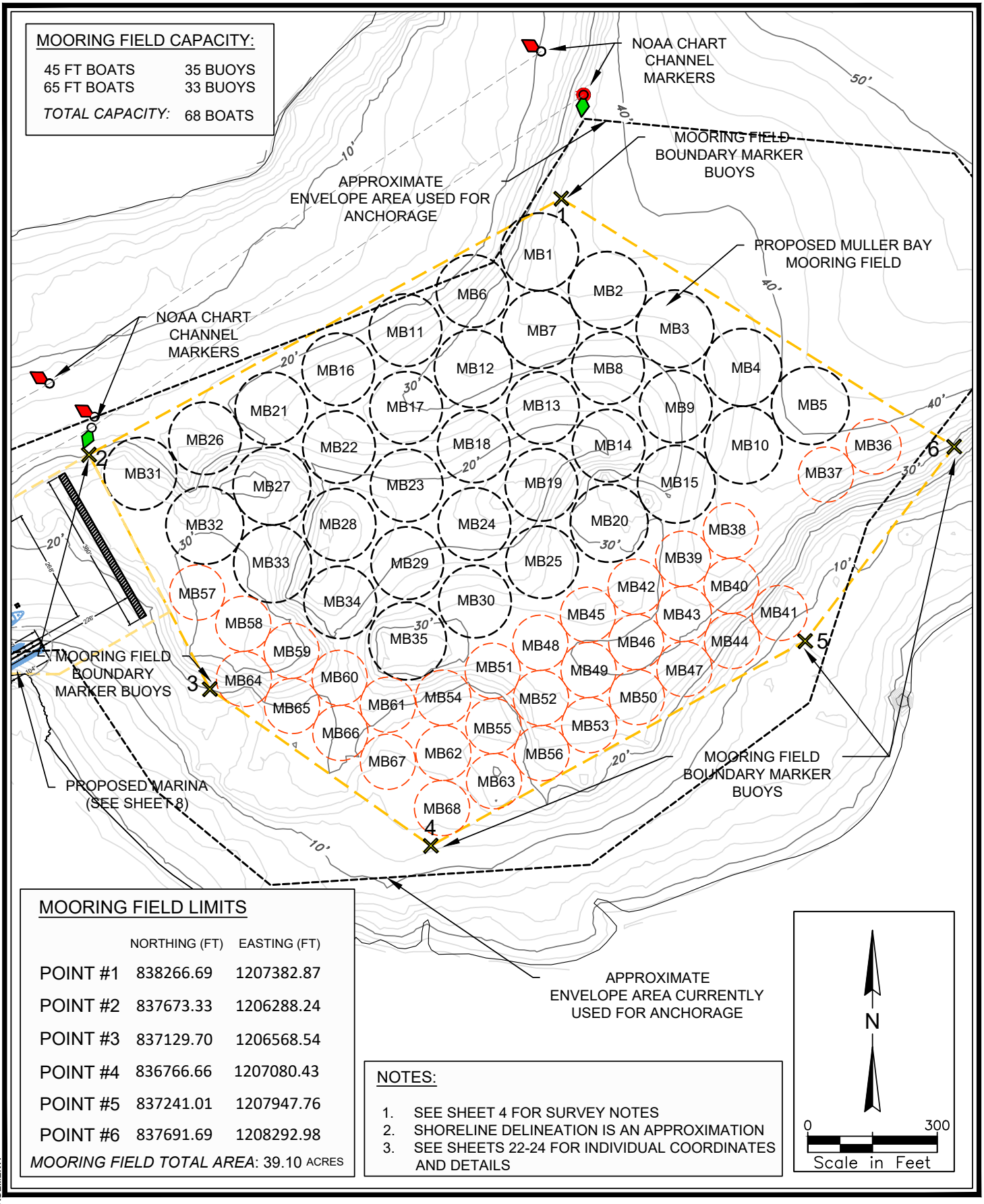
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



WAVE ATTENUATOR
SECTION H-H' 1"=20'



MOORING FIELD LIMITS

	NORTHING (FT)	EASTING (FT)
POINT #1	838266.69	1207382.87
POINT #2	837673.33	1206288.24
POINT #3	837129.70	1206568.54
POINT #4	836766.66	1207080.43
POINT #5	837241.01	1207947.76
POINT #6	837691.69	1208292.98

MOORING FIELD TOTAL AREA: 39.10 ACRES

NOTES:

1. SEE SHEET 4 FOR SURVEY NOTES
2. SHORELINE DELINEATION IS AN APPROXIMATION
3. SEE SHEETS 22-24 FOR INDIVIDUAL COORDINATES AND DETAILS

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OVERALL PROPOSED PLAN
MULLER BAY MOORING FIELD

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 20 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

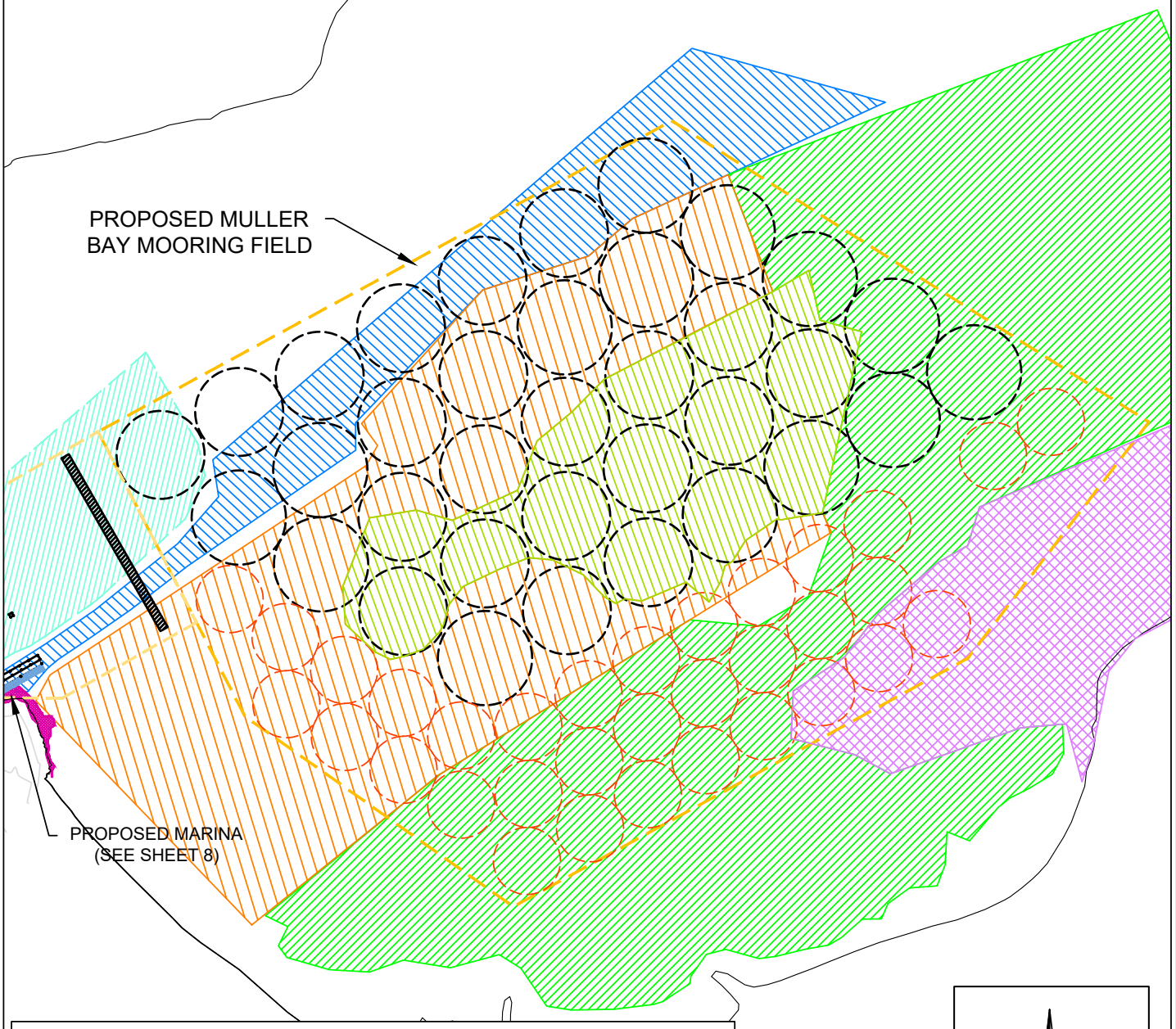
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

NOTE:

1. BENTHIC HABITAT SURVEY SOURCE: BIOIMPACT, 2021



HABITAT MAPPING BY BIOIMPACT

- HARD BOTTOM - CRITICAL HABITAT
- SCATTERED HARDBOTTOM AND MODERATE CORAL COVERAGE
- PATCHY SEAGRASS AND VARYING DENSITIES ALGAE
- MACRO ALGAE
- H STIPLACEA, MACRO-ALGAE, AND T TESTUDINUM
- T TESTUDINUM, S FILIFORME, AND MACRO-ALGAE
- PATCHY SAND WITH HARDBOTTOM SCATTERED CORALS AND SEAGRASS

N

0 300

Scale in Feet

DIEGO.DELGADO\AMR@CATION G:\WESTPALMBEACH SHARES\DRAWINGS\PROJECTS\19-3374 VI VESSUP POINT MARINA FEASIBILITY NDA\X\PERMIT\VESSUP_ATM\SUPPORT AUG2022\ATM_LATITUDEMARINA_PERMITSET_16DEC22.DWG

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EXISTING BENTHIC HABITAT MULLER BAY MOORING FIELD

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

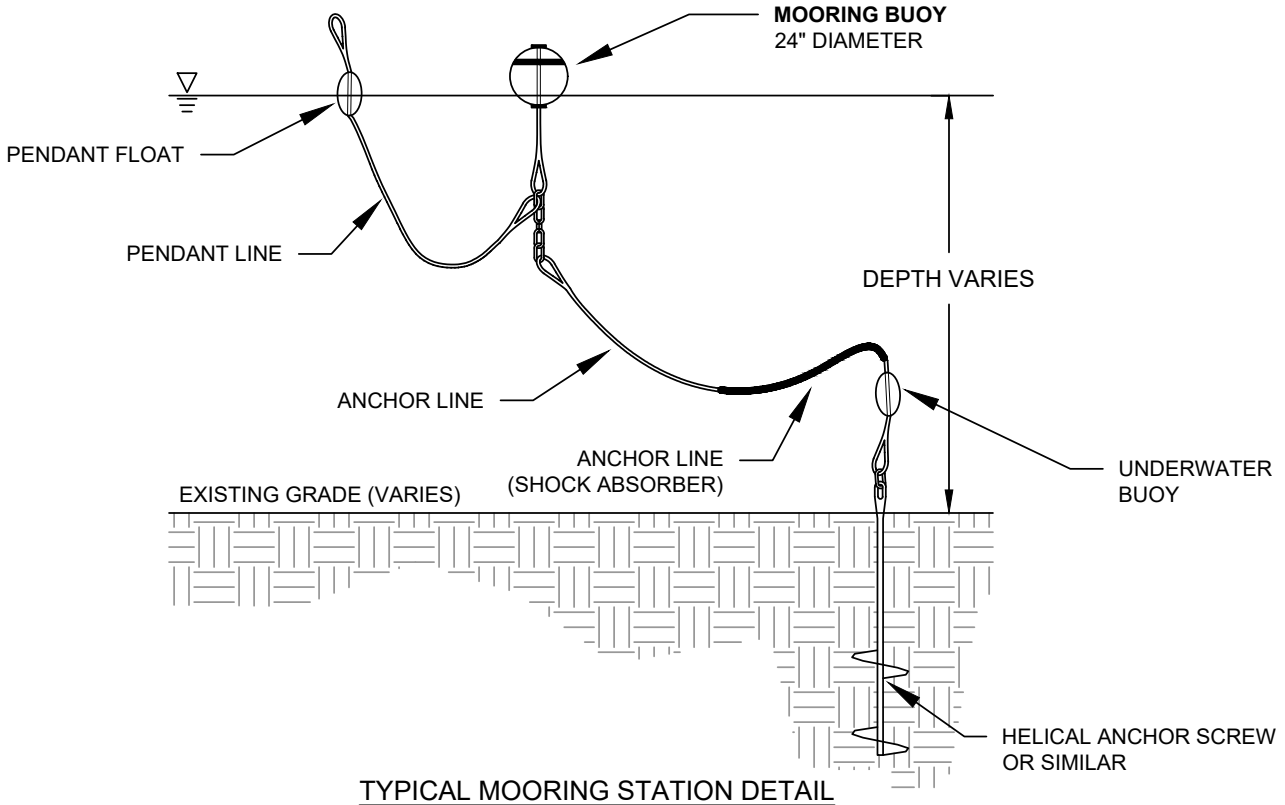
Sheet Number: 21 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

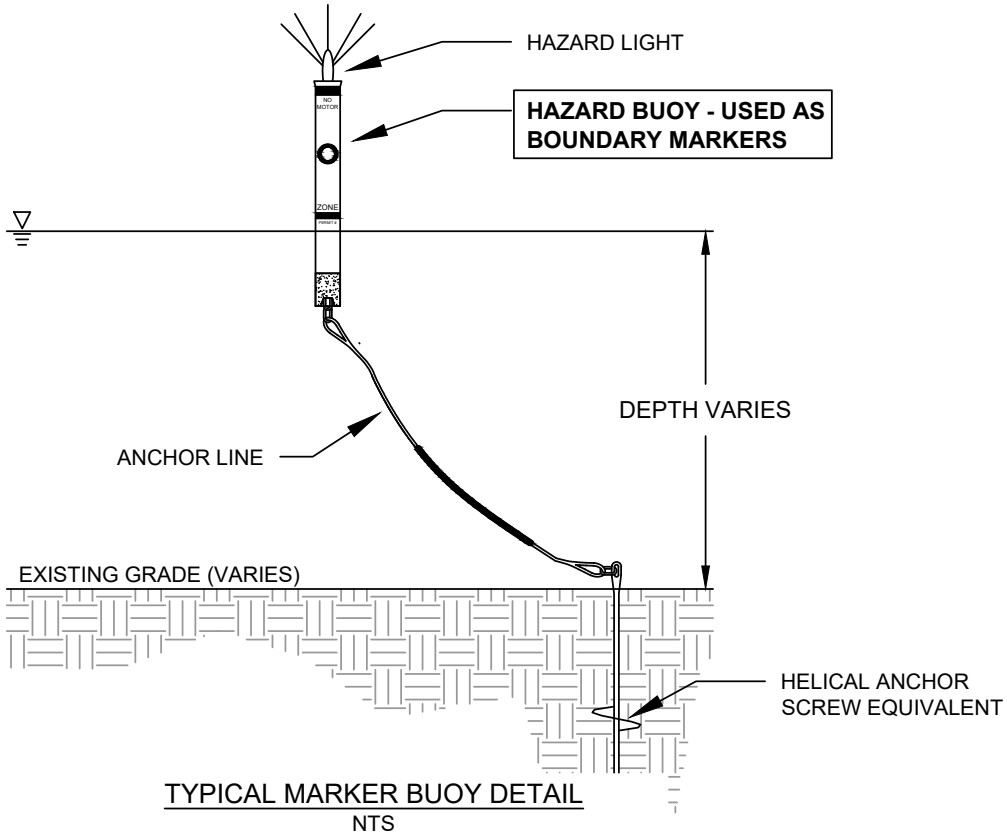
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



TYPICAL MOORING STATION DETAIL
NTS



TYPICAL MARKER BUOY DETAIL
NTS

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MOORING FIELD
TYPICAL ANCHOR DETAILS

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 22 of 24

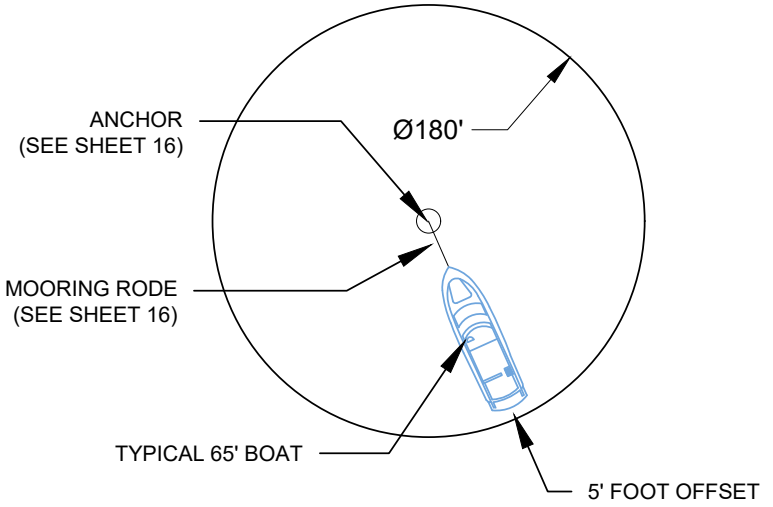
FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

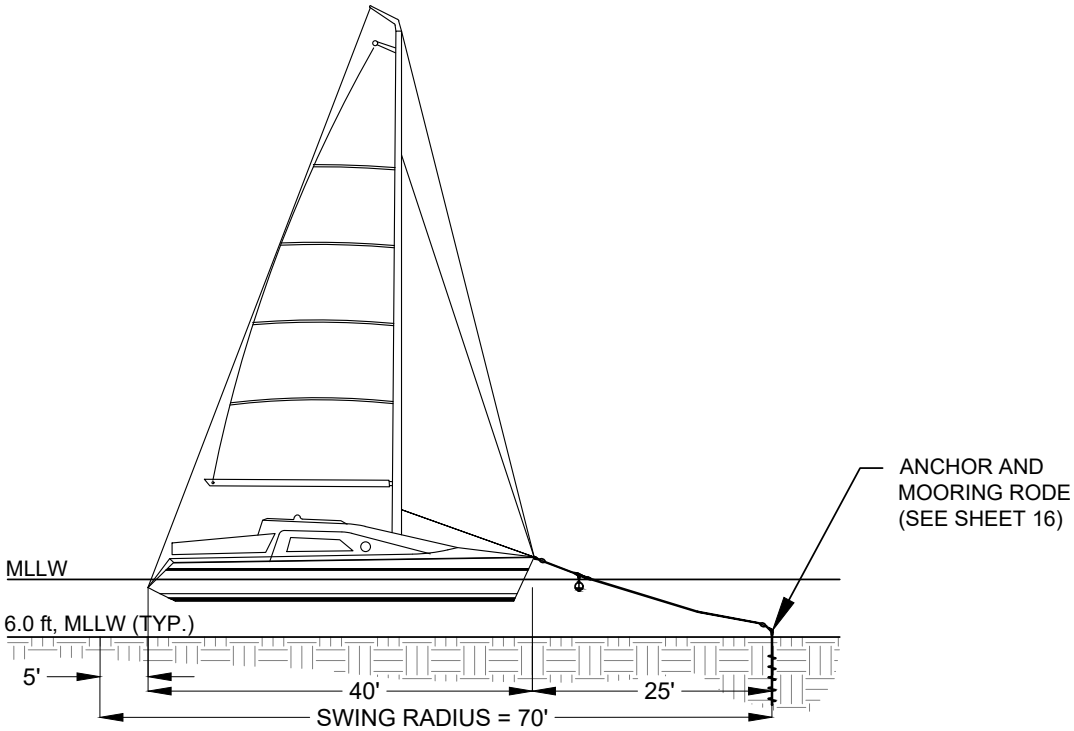
Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

TYPICAL MOORING FIELD STATION
MULLER BAY (MB1 THRU MB68)





TYPICAL VESSEL AT MOORING FIELD
VESSUP BAY 1"=20'

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MOORING FIELD
ADDITIONAL ANCHOR DETAILS

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 23 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

MULLER BAY MOORING FIELD (65 ft VESSELS)			
BUOY	NORTHING (FT)	EASTING (FT)	SWING RADIUS (FT)
MB1	838143.1487	1207332.639	90
MB2	838053.9131	1207489.47	90
MB3	837964.6779	1207646.30	90
MB4	837875.4425	1207803.131	90
MB5	837786.6332	1207959.711	90
MB6	838052.3894	1207177.196	84
MB7	837963.1538	1207334.026	90
MB8	837873.9186	1207490.856	84
MB9	837784.6832	1207647.687	84
MB10	837695.6166	1207804.418	90
MB11	837961.6302	1207021.752	84
MB12	837872.3948	1207178.582	90
MB13	837781.8624	1207338.249	84
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MB15	837604.600	1207649.125	90
MB16	837870.8709	1206866.308	84
MB17	837781.6355	1207023.139	84
MB18	837692.4001	1207179.969	84
MB19	837603.1647	1207336.799	84
MB20	837513.9293	1207493.63	84
MB21	837780.1117	1206710.864	84
MB22	837690.8763	1206867.695	84
MB23	837601.6409	1207024.525	84
MB24	837512.4055	1207181.356	84
MB25	837424.052	1207338.179	84
MB26	837711.110	1206557.410	84
MB27	837600.117	1206712.251	84
MB28	837510.8816	1206869.081	84
MB29	837421.6462	1207025.912	90
MB30	837332.4108	1207182.742	84
MB31	837629.080	1206407.400	84
MB32	837509.3578	1206556.807	84
MB33	837420.1224	1206713.638	84
MB34	837330.887	1206870.468	84
MB35	837241.2069	1207026.537	84

MULLER BAY MOORING FIELD (45 ft VESSELS)			
BUOY	NORTHING (FT)	EASTING (FT)	SWING RADIUS (FT)
MB36	837692.002	1208106.121	64
MB37	837627.0191	1207995.843	64
MB38	837497.0531	1207775.288	64
MB39	837432.0701	1207665.01	64
MB40	837369.0619	1207776.787	64
MB41	837306.0539	1207888.565	64
MB42	837367.0871	1207554.732	64
MB43	837304.0789	1207666.509	64
MB44	837241.0707	1207778.287	64
MB45	837302.1042	1207444.454	64
MB46	837239.0959	1207556.232	64
MB47	837176.0877	1207668.009	64
MB48	837237.1212	1207334.176	64
MB49	837174.1129	1207445.954	64
MB50	837111.1047	1207557.731	64
MB51	837172.1382	1207223.898	64
MB52	837109.13	1207335.676	64
MB53	837046.1217	1207447.453	64
MB54	837109.8621	1207109.323	64
MB55	837044.147	1207225.398	64
MB56	836981.1388	1207337.176	64
MB57	837353.6101	1206539.26	64
MB58	837281.0976	1206645.908	64
MB59	837218.5232	1206757.57	64
MB60	837155.9488	1206869.233	64
MB61	837093.3745	1206980.895	64
MB62	836981.9085	1207109.572	64
MB63	836916.1558	1207226.898	64
MB64	837153.0767	1206647.567	64
MB65	837090.5024	1206759.229	64
MB66	837027.928	1206870.891	64
MB67	836961.3783	1206981.043	64
MB68	836853.9483	1207106.381	64

NOTES:

1. SWING RADIUS VALUES TAKE WATER DEPTH INTO ACCOUNT

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West Palm Beach, FL 33411
(561) 659-0041
Certificate of Authorization #4669

MOORING FIELD
BUOYS COORDINATES

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

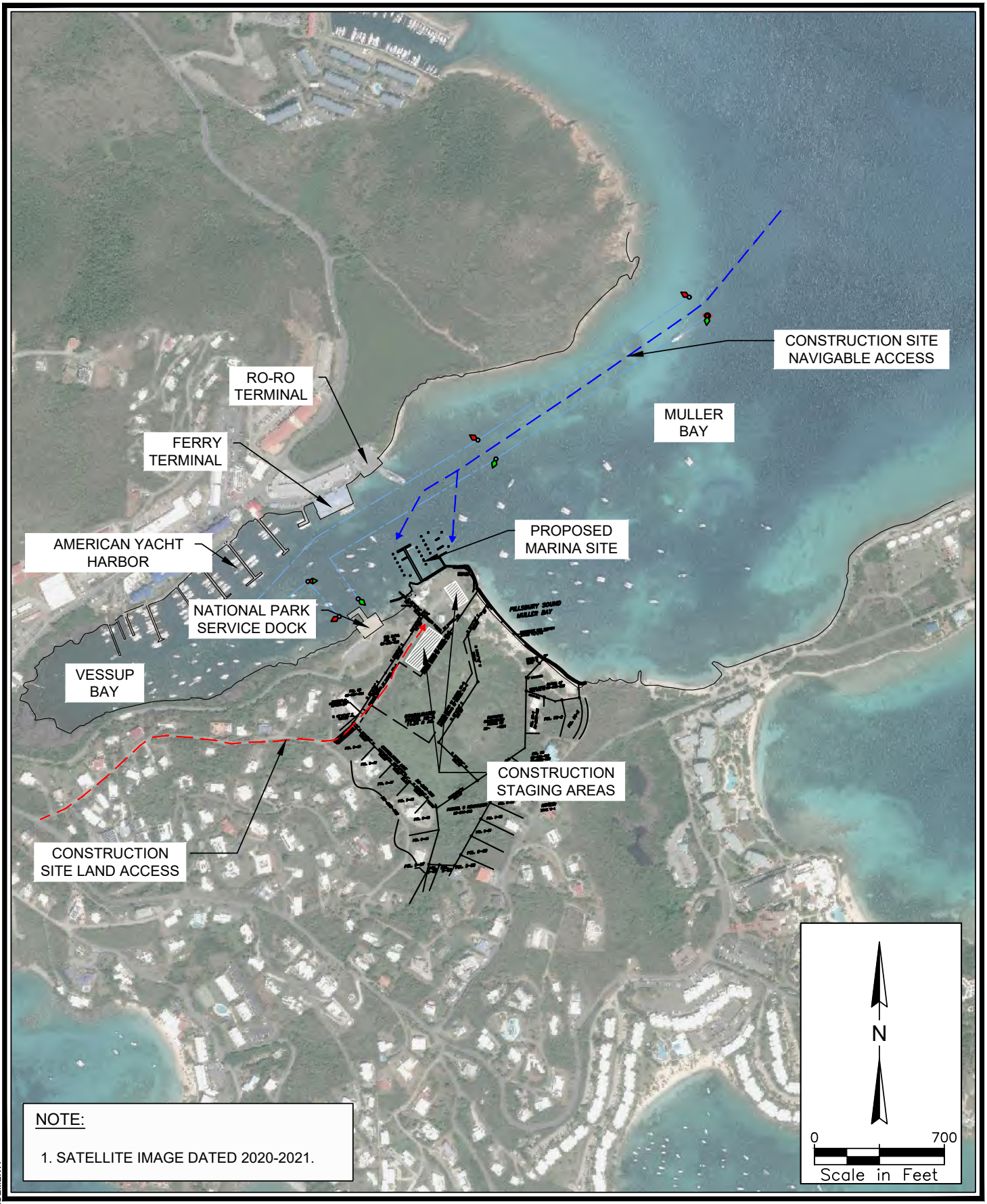
Sheet Number: 24 of 24

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022



NOTE:

1. SATELLITE IMAGE DATED 2020-2021.

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West Palm Beach, FL 33411
(561) 659-0041
Certificate of Authorization #4669

CONSTRUCTION ACCESS & STAGING AREAS

LATITUDE 18 MARINA

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 25 of 25

FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: 12-19-2022

DIEGO.DELGADO\AMARGOATION G:\WESTPALMBEACH SHARES\DRAWINGS\PROJECTS\19-3374 VI VESSUP POINT MARINA FEASIBILITY NDA\X\PERMIT\VESSUP ATM\SUPPORT AUG2022\ATM LATITUDEMARINA PERMITSET 16DEC22.DWG

APPENDIX B

Muller Bay Managed Mooring Field
Management Plan
DRAFT OUTLINE

1.0 INTENT OF MANAGEMENT PLAN

This Management Plan (Plan) provides the framework for operation and use of the proposed Muller Bay Managed Mooring Field (Facility) for xx vessels preempting xxxxx square feet in Muller Bay. The provisions of this Plan relate to the entire Facility, including the buoys, associated dinghy dock for access to the upland support facility amenities, and upland support facility amenities. Since the dinghy dock and upland facilities are part of the Latitude 18 Marina, when in conflict, marina management provisions shall have priority.

The provisions in this Plan apply to any vessels, owners, crew, guests, or any other persons entering the Facility. Failure to comply with the Facility Rules and Regulations in this Plan and shall be sufficient grounds for ejection from the Facility and/or legal action. Furthermore, failure to comply with the Facility Rules and Regulations in this Plan may constitute a violation of CZM Regulations and/or Local Ordinances. .

2.0 FACILITY RULES AND REGULATIONS

2.1 Mooring Field Operations Manager (Harbormaster)

The Harbormaster shall enforce the provisions of all permits granted for the Facility. The Harbormaster shall assign each vessel to a mooring. No vessel shall occupy any mooring without the approval of the Harbormaster. The transfer of vessels from one mooring to another must be authorized by the Harbormaster. Approaching vessels shall raise the Harbormaster on VHF Channel 16 or by phone at [XX] for assignment to a temporary mooring until all paperwork has been completed and the Harbormaster assigns that vessel to a mooring for the duration of the stay. Berthing in the Latitude 18 marina or anchoring inside of the marked boundaries of the facility or within 100' outside of the marked boundaries is prohibited unless approved by the Harbormaster. For safety, security, or other management considerations the Harbormaster may move or relocate any vessel from one mooring to any other mooring at the sole discretion of the Harbormaster.

Any violation of these Rules and Regulations may void the Mooring Rental Agreement and/or result in the ejection of the vessel from the Facility, as well as the forfeiture of any part or all of the security deposit, at the sole discretion of the Harbormaster. The interpretation of these Rules and Regulations is the responsibility of the Harbormaster. Appeals thereof may be made to the xxx Commission.

2.2 Operational Vessels Only

Only vessels in compliance with the United States Coast Guard (USCG) environmental and safety standards and Chapter 327 of Florida Statutes, are authorized to moor at the Facility. Only vessels in good operational condition, capable of maneuvering under their own power, and with

current registration or documentation are authorized to moor at the Facility. The determination of whether a vessel is in good operational condition is the sole discretion of the Harbormaster. Vessels without integral or functional power for propulsion are prohibited from mooring at the Facility.

2.3 Vessel Equipment Requirements

All vessels should have a dinghy or other small craft as an alternate means of conveyance to enable access to the dinghy dock and Harbormaster's Office. In the absence of a dinghy, the vessel owner shall inform the Harbormaster at the time of entry into the Facility. The lack of a dinghy shall not be cause to refuse the rental of a mooring. The Harbormaster may allow the use of a Facility dinghy for the vessel occupants to access the upland property, if the Harbormaster has such a dinghy and it is available, and on the condition that the use of that dinghy is and remains at the sole risk of the user. It is the sole responsibility of vessel occupants to provide their own conveyance to the upland facilities. The Harbormaster is under any obligation to own, operate, or maintain a dinghy for the exclusive use of mooring patrons.

2.4 Commercial Use of Moorings

Commercial activities and vessels engaged in commercial activities shall be identified in the rental agreement. Commercial activities for new vessels after one year of initiation of operations may be restricted by the Harbormaster due to operational requirements. However, this does not prohibit commercial vessels from using the Facility or its amenities.
No advertising or soliciting shall be authorized on any vessel within the Facility, with the exception of "for sale " signs not to exceed two (2) square feet in size. Each vessel shall be limited to a maximum of two (2) such signs.

2.5 Mooring of Vessels

The mooring field will accommodate xx vessels excluding any dinghies that may be attached to parent vessels. All persons arriving by vessel or dinghy must register at the Harbormaster's Office (or through other means as available) within twelve (12) hours of arriving, although advance registration is recommended. Vessels shall be moored in designated mooring areas only, as assigned by the Harbormaster. The sole method for securing a vessel to a mooring shall be by securing the bow of the vessel to the mooring buoy pendant. Securing the mooring to the stern of any vessel is prohibited. Additionally, the use of additional anchors to supplement the provided mooring is prohibited. Anchoring within the marked boundaries of the Facility is prohibited unless approved by the Harbormaster.

Dinghies shall be kept on board or tied closely to parent vessel when not in use and shall not impede or restrict access to fairways or channels. Subleasing of the vessel or assignment of the rental agreement is prohibited. Rafting or mooring of more than one vessel to any buoy, without prior approval of the Harbormaster, is prohibited.

2.6 Order of Mooring Assignment

Moorings will be assigned by the Harbormaster on a first come, first served basis.

2.7 Length of Stay

The mooring field will potentially accommodate live-aboard vessels. A live-aboard is defined in the xxxxxx as a "vessel docked at the facility and inhabited by a person or persons for any five (5) consecutive days or a total of ten (10) days within a 30-day period. Liveaboard status at the Facility will not exceed six (6) months within a 12-month period. Nor shall any such vessel constitute a legal primary residence." All moorings are available to vessels on a first come, first served basis, including transient vessels.

Commented [EB1]: Replace by USVI Code language

2.8 Illegal Activities Prohibited

Any illegal activity within the Facility is grounds for immediate prosecution under the provisions of applicable laws. It is the intent of the xxx to prosecute each violation to the fullest extent of the law. If there is reasonable cause for suspicion of an illegal activity occurring in the Facility, the appropriate authorities will be contacted immediately. xxxx has a zero-tolerance policy for drug use or possession. Such use or possession shall be immediately prosecuted to the fullest extent of the law.

Commented [EB2]: Replace by USVI appropriate language and regulator policies

2.9 Waste Management/Marine Pollution

Discharge of human and/or pet waste overboard within the Facility is prohibited. Upon entering the Facility, vessels shall secure their sewage holding tank to ensure no overboard discharge. All vessels with holding tanks must provide documentation to the Harbormaster of sewage tank pumpout within 3 days of entering or reentering the mooring field.

Latitude 18 marina will provide a pump out station that shall be used. Alternatively, a mobile pumpout boat may service the area.

There shall be absolutely no overboard discharge of any sewage into any area of the Mooring Field except into a pumpout vessel.

All vessels with overnight or liveaboard occupants will be required to have their holding tanks pumped out no less than every seven (7) days minimum without fail and shall provide documentation to the Harbormaster. Violation of this provision shall constitute grounds for immediate ejection from the Mooring Field and forfeiture of security deposit.

Logs to record pump outs and inspections of seals on vessels without holding tanks shall be maintained by the Harbormaster and made available for inspection upon reasonable notice.

2.10 Use of Dinghy Dock

The Facility will provide a dinghy dock to accommodate dinghies of Facility customers at no charge on a first come, first served basis. At the discretion of the Harbormaster, dinghies of non-Facility customers shall pay a landing fee and be issued a Use Permit by the Facility. First priority for dinghy dock use and dinghy landing shall be given to dinghies of Facility customers over all other dinghies with regard to space availability. Dinghies of the Facility customers must display such identification markers as provided by the Harbormaster. These markers will establish proof of current Facility tenancy or Use Permit as required at all times to use the dinghy dock.

Use of the dinghy dock is restricted to such reasonable limits on time as may be established by the Harbormaster. No dinghy shall be left at the dinghy dock for more than twenty-four (24) continuous hours without prior authorization from the Harbormaster. Tying of dinghies by Mooring Field tenants or other non-Mooring Field vessel owners to the docks, piers and seawalls owned by the Harbormaster is prohibited. Unattended dinghies found tied to the docks, piers and/or seawalls of the Harbormaster's facility will be considered abandoned and will be seized and impounded.

Unattended dinghies found tied to the dinghy dock will be considered abandoned and will be seized and impounded for purposes of disposal.

2.11 Unattended Vessels/Abandonment of Vessels

Any vessel left unattended for more than twenty-four (24) continuous hours without the prior approval of the Harbormaster will be considered abandoned by xxx. The xxx will pursue removal of the vessel pursuant to the provisions of xxxxxx.

Commented [EB3]: Include USVI statutes

2.12 Fueling Prohibited

The fueling of vessels within the Facility is prohibited. Vessel fueling is permitted at designated fueling stations only.

3.0 RESPONSIBILITIES OF LICENSEES/TENANTS

3.1 No Liability on Use of Mooring Facility

Neither the Facility owner nor its operator assume no liability for the use by vessel owners, operators, guests, or other personnel, of the moorings, dinghy dock, and/or upland amenities comprising the Facility. The Facility owner, operator, their personnel, and the Harbormaster assume no liability for personal possessions, vessels, or associated equipment, including dinghies, while at the Facility.

3.2 Safe Operation of Vessels

Reckless operation of any vessel, including a recreational vessel, small craft, or dinghy that, in the sole judgment of the Harbormaster, is an endangerment to life, property, or other vessels, shall be grounds for immediate ejection from the Facility.

3.3 Use of Vessel/Pumpout Facilities

Vessels moored at the Facility are required to utilize nearby pumpout facilities or the pumpout vessel. Those vessels utilizing a Type I or Type II Marine Sanitation Device are prohibited from discharging within the mooring field boundary and will be required to prove the functionality of their system or to seal their tanks. Any use of its system must be in strict compliance with USCG and State regulations.

All vessels are prohibited from discharging sewage, treated or untreated, within the mooring field boundary. All live-aboard vessels must provide the Harbormaster with documentation of pumpout once every seven (7) days from one of the available facilities. Such documentation will be required on a monthly basis and will be kept on file at the Harbormaster's Office and with the Martin Ship Pump Out Program Manager.

The Harbormaster, at their discretion, may require the placement of trace dye tablets into the holding tank of any vessel moored within the Facility to verify that it meets the zero discharge standards of the Clean Vessel Act.

3.4 Repairs Prohibited

Boat repairs and the refitting of vessels, including any activities which could result in the discharge of materials into the water or within the Facility, are prohibited. Minor repairs and maintenance work may be conducted only with the prior authorization of the Harbormaster. The determination of whether the proposed work qualifies as minor repairs and maintenance is at the sole discretion of the Harbormaster. The Harbormaster shall be contacted in advance of any proposed work to verify compliance. Additionally, only Facility owner staff or their contractors shall undertake and accomplish any repairs to docks, piers, moorings, or any other common area structures or appurtenances. Any unauthorized activity in violation of the above may result in ejection from the Facility and forfeiture of security deposit.

3.5 Storage of Materials or Equipment

Personal equipment, property, or stowage facilities may not be kept or used on the Facility's dinghy dock, walkways, common areas, or parking lot, except by permission of the Harbormaster and for limited time and exceptional circumstances. No motorized vehicle of any kind shall be driven, operated, stored or otherwise permitted on the Facility's dinghy dock, walkways, common areas, or parking lot except by permission of the Harbormaster or in areas clearly designated for the use or parking of motorized vehicles. Use of motorized vehicles in these areas is by Harbormaster-issued permit only.

3.6 Waste Disposal/Trash Removal

Discharge of any solid or liquid waste (human or pet) into the waters within the Facility is prohibited. Violators are subject to immediate ejection from the Facility, and the Harbormaster will notify the appropriate authorities for enforcement action. Mooring Field Patrons are encouraged to utilize upland facilities.

Garbage must be transported and deposited ashore in Facility receptacles. Vessel owners shall contact the Facility for information regarding proper disposal of waste oil, rags, bilge socks, absorbents, anti-freeze, used fuel, and batteries. The Facility does not accept any hazardous waste or materials for disposal.

3.7 Prohibited Activities (including, but not limited to)

- Major repairs and/or refitting of vessels or associated equipment
- Charcoal, wood, or open flame burners (cooking stoves to be UL approved)
- Swimming or diving within the Facility unless performing vessel maintenance or minor repairs (to be approved by Harbormaster)
- Advertising, or soliciting
- Disorderly, rowdy, or boisterous conduct; excessive noise that disrupts the quiet enjoyment by others of the Facility
- Hanging laundry from the vessel in public view
- Anchoring within mooring field boundaries without prior approval from the Harbormaster
- Berthing at the Latitude 18 marina, except for pre-approved exception granted by Harbormaster

3.8 Manatees and Other Protected Species/Feeding of Wildlife

Vessel owners and their guests shall acquaint themselves with the publications and warnings available at the Harbormaster's Office regarding safe operation in waters frequented by manatees, and they must abide by all laws, ordinances, rules, and regulations governing the operation of watercraft in the presence of manatees. Harassment of Federal- or State-listed protected species is illegal and will not be tolerated. Lists of these species are available at the Harbormaster's Office. All vessel owners and guests are prohibited from feeding or leaving food for wildlife, particularly birds or endangered species.

3.9 Vessel Inspections/Boarding by Law Enforcement Personnel

The Harbormaster shall be authorized to conduct periodic vessel inspections in order to ensure compliance with Federal and State safety and marine sanitation regulations. Denial of an inspection shall be grounds for termination of the vessel's Mooring Agreement. The vessel owner shall fully comply with the directions of the Harbormaster and Law Enforcement personnel and shall allow access to their vessel by those personnel as necessary.

3.10 Reporting of Fuel/Oil Spills

Vessel operators/owners shall contact the Harbormaster's Office and National Response Center Spill Hotline (800-424-8802) when an oil/fuel spill is discovered. Oil absorbent pads and containment booms are located at the Harbormaster's Office and are available for deployment in the event of a spill. The use of detergents to break up oil spills is strictly prohibited.

Commented [EB4]: Update with USVI appropriate information

3.11 Vessel Cleaning

Cleaning or washing vessels with detergents containing phosphates, chlorine, or petroleum distillates is prohibited within the Facility.

3.12 Non-tenant Use of Moorings Prohibited

Non-tenants are prohibited from mooring within the Facility without prior approval from the Harbormaster, except in cases of emergency or as otherwise provided in this Plan.

3.13 Misuse of Facility Amenities

The misuse of any Facility amenity is grounds for ejection from the Facility. If any tenant, guest, or crew damages the property or equipment of the Facility due to neglect, misuse, failure to follow stated directions, or vandalism, they shall be held responsible for the cost of repair and replacement, as well as any criminal or civil charges for the activity.

3.14 Use of Upland Laundry, Restrooms and Showers

Laundry facilities, restrooms and showers designated for use by mooring field tenants are provided on the upland support facility. Facility tenants shall not use amenities designated for Latitude 18 marina tenants.

3.15 Use of Parking Lot

Parking facilities designated for Facility tenants and guests will be provided. All vehicles must be operable and properly licensed and must display a valid parking permit issued by the Harbormaster. All bicycles must be kept at the bicycle rack provided in the common area when not in use. All vehicles must be removed within twenty-four (24) hours after the vessel is vacated from the Facility.

3.16 Unauthorized Departure of Vessels

It is unlawful for vessel operators/owners to remove their vessel from the Facility without authorization from the Harbormaster when the vessel has a delinquent dockage balance. The Harbormaster has the authority to prevent its removal until the delinquent dockage balance is satisfactorily addressed.

3.17 Liens

The Facility owner will maintain a maritime lien and/or a possessory lien pursuant to xxxx Statutes xxx against the vessel, its appurtenances, and contents for all unpaid mooring fees, late charges, storage fees, repairs, improvements, work-related storage charges or any damage caused to any mooring or any other property of the Facility. The Facility owner will pursue all remedies permitted by law, including but not limited, to foreclosure of any lien and/or nonjudicial sale of any vessel. Nothing in this section precludes the Facility owner from maintaining any other lien or pursuing any other legal remedies available for any breach of the Mooring Agreement or this Management Plan.

3.18 Emergency Repairs

As part of the Mooring Agreement, tenants must grant consent to the Harbormaster such that in the event of an emergency the Harbormaster has the authority to have necessary repairs made to the tenant's vessel, as economically as possible. Emergencies include, but are not limited to, tropical storms and hurricanes; breakdown of a bilge, fuel, sewage pump, or any other leak; chafed or broken lines; or any other emergency that may imperil the vessel and possibly lead to sinking, damage to other vessels within the Facility, or damage to the Facility. The cost of these repairs, parts, labor, and any other appropriate charges will be billed to the vessel owner and payable within 24 hours of the vessel owner's return or as provided by the Harbormaster.

3.19 Rental Fees

The Facility owner will establish all mooring charges and will assess and adjust any mooring charges as necessary to cover the costs of operation, maintenance, or the projected costs of future expansion of the Facility.

4.0 HURRICANES AND TROPICAL STORMS

4.1 Evacuation of Vessels for Storm Event

Mooring facilities are generally not safe locations for vessels during strong named tropical storms or hurricanes and leaving vessels in mooring fields during such storms could result in significant damage to other vessels, local properties, and the Facility.

The Facility owner requires that all vessels evacuate the Facility at or before the time there is a declared hurricane watch or warning. Tenants are advised that mooring equipment provided in the Facility may not withstand hurricane or tropical storm or associated wind or tidal surge. Removal of vessels from the mooring field is mandatory for a Category I or above hurricane.

After a tropical storm or hurricane watch has been issued, the Harbormaster, a mooring field owner or operator, or an employee or agent of such owner or operator, may take reasonable actions to further secure any vessel within the mooring field to minimize damage to a vessel and to protect Facility property, private property, and the environment and may charge a reasonable fee for such services.

Mooring systems shall be inspected for damage after a named storm has passed to evaluate under water damages. If the mooring equipment is damaged as a result of a tenant's failure to remove their vessel, the tenant may be charged accordingly for the necessary repairs.

4.2 Customer Education

The Harbormaster shall install a permanent information display board in a clearly visible location at the land-based support facility, providing information on:

- Operational provisions and restrictions associated with use of the mooring field and land-based support facility;
- Manatee protection and applicable environmental protection rules and regulations;
- Location and availability of sewage pumpout facilities and procedures;
- Navigational ingress and egress to the mooring field and land-based support facility, including identification of channel markers, shoals, and other significant navigational issues, such as controlling water depths; or by providing charts for sale or a location where they may be purchased.
- Seagrasses, corals, and other significant resources in the adjacent waters, such as their location, protection, and avoidance of impacts, and their importance to the water resources; and,
- Prohibitions on discharging trash, sewage, and hazardous wastes into the water, and ways to minimize discharging grey water into the water.

5.0 SOVEREIGNTY SUBMERGED LANDS LEASE

This mooring field and dinghy dock are also authorized under Sovereignty Submerged Lands Lease No. xxxx.

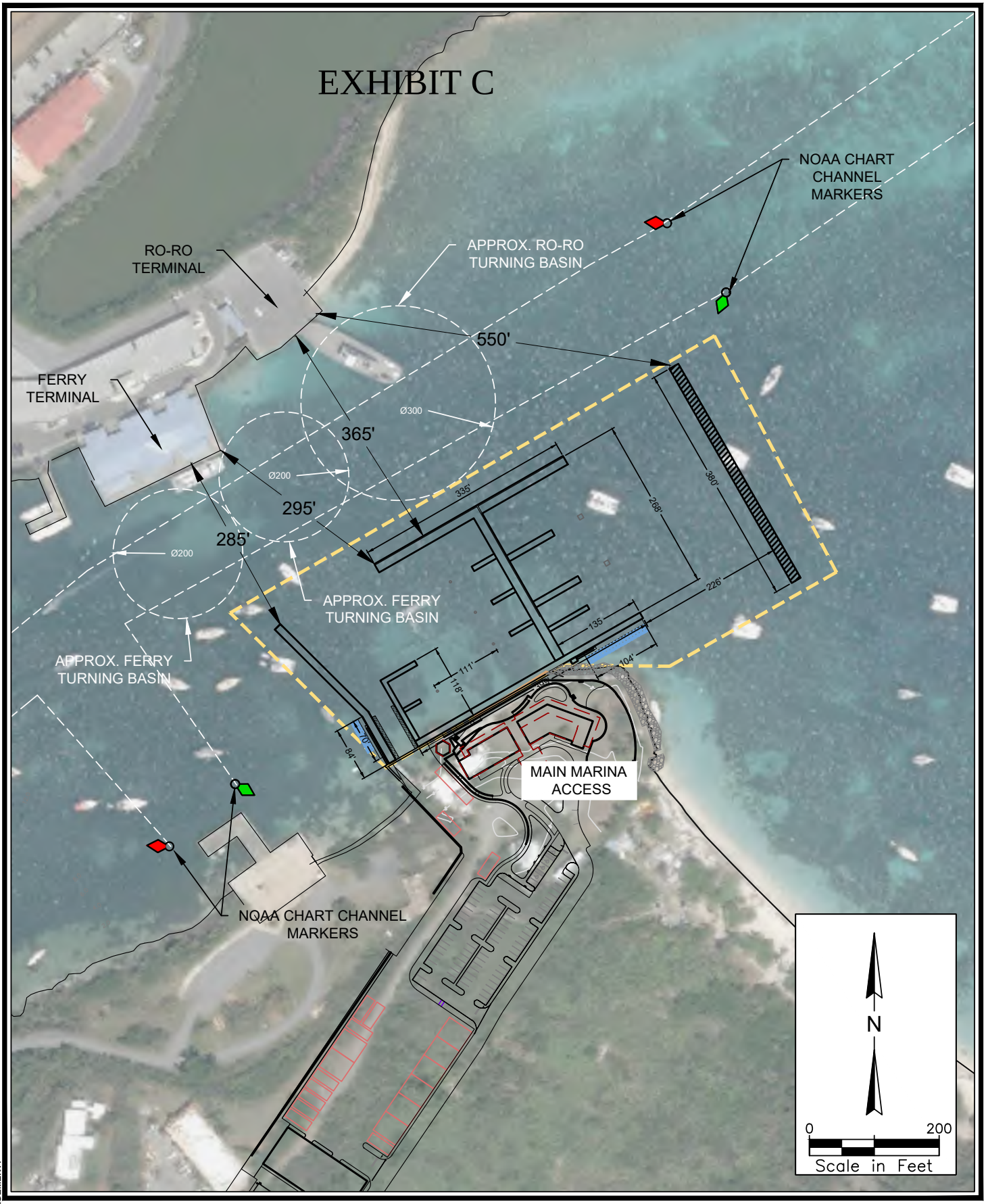
The lease boundary includes the over-water surface area of the mooring field, encompassing all of the swing areas and square footage between the swing areas, including internal thoroughfares. The lease boundary includes the preempted area for the dinghy dock that contains a temporary mooring area to access a fixed sewage pumpout and for the mooring of a sewage pumpout vessel.

This Management Plan is referenced in xxxxxx.

6.0 OTHER

Add any other regulatory requirement resulting from local rules regarding disability access, information, etc

EXHIBIT C



DIEGO.DELGADOTAM@GATION G:\WESTPALMBEACH SHARES\DRAWINGS\PROJECTS\19-3374 VI VESSUP POINT MARINA FEASIBILITY NDA\X\PERMIT\VESSUP ATM\SUPPORT AUG2022\ATM LATITUDEMARINA PERMIT FORFIGURES_16DEC22.DWG

ATM
A Geosyntec Company
2047 Vista Parkway, Suite 201
West Palm Beach, FL 33411
(561) 659-0041
Certificate of Authorization #4669

OVERALL PROPOSED PLAN
MARINA

Vessup Point Marina

Requested by:
Jack Rock B-A, LLC
Redhook Hayes B Rem, LLC

Sheet Number: 8 of 24

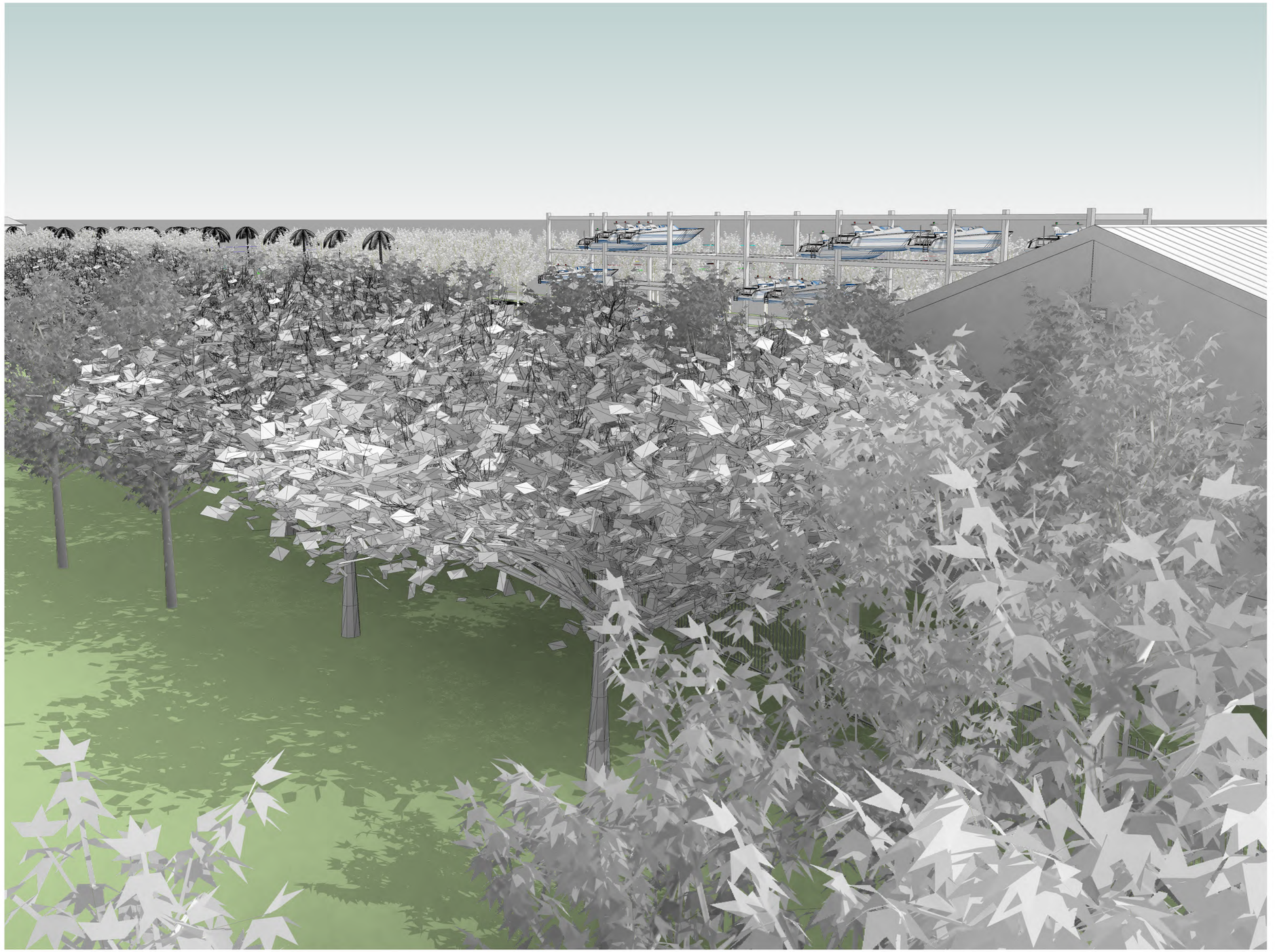
FOR PERMITTING PURPOSES ONLY
NOT FOR CONSTRUCTION

Location: Vessup Bay, St. Thomas , USVI
Parcel ID:
Waterbody: Muller Bay - Vessup Bay

Latitude: 18 19' 32" N
Longitude: 64 50' 54" W

Issue Date: xx-xx-xxxx

EXHIBIT D



1 A-A233 VIEW FROM SECOND LEVEL APARTMENT
SCALE:

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Architects, Engineers and Planners

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ARCHITECTS

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DESIGN DISTRICT, PLLC

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ATM
2047 Vista Parkway, Suite 101
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Contact: Esteban Biondi
Phone:561-472-2145
Email: ebiondi@appliedtm.com

ISSUANCES		
No.	Drawing Issue Description	Date
4	CZM APPLICATION REVISION	12/15/2022

LATITUDE 18 MARINA

REM. CONSOLIDATED 9B-A NAZARETH
ST. THOMAS, USVI
♦
JACK ROCK B-A C LLC

VIEW FROM APARTMENT NEXT DOOR

Checker — Project Architect
2021002 — Project No.
09/15/22 — Date

A-A233
Drawing No.

NOT ISSUED FOR CONSTRUCTION