

Jean-Pierre Oriol
Director, Division of Coastal Zone Management
Department of Planning and Natural Resources Cyril E. King Airport Terminal, Second Floor St. Thomas,
Virgin Islands 00802

Re: Major Water Permit Application No. CZT-1-18(W) Great St. Jim, LLC, St. Thomas, Virgin Islands for
the Construction Temporary Barge Landing, an Access Dock and a Combination Dock and Barge Landing

Dear Mr. Oriol;

Please see the attached responses to your letter of deficiencies.

1. Please find the list of adjacent property owners attached.
2. A clearance letter has been requested from the State Historical Preservation Office (SHPO) and will be forwarded as soon as it is received. We resent the request prior to sending this response incase it was misplaced during the storms and recovery.
3. Please find the requested maps attached herewith.
4. Please find BCSC Dospiva's Qualifications attached. Their qualifications statement will also be in the Appendix of the revised EAR.

Letter: The removal of the dock which was not permitted by the USACE is now described in the EAR section 5.00. These areas are highlighted for ease of review in the revised EAR. The following has been added to the list sections below.

"5.0 SUMMARY OF PROPOSED ACTIVITY

The existing dock in the shallow northern bay will be removed as soon as one of the other two access docks are functional. The dock will have the decking removed, and then the stringers and pile caps will be disassembled. This will all be done by workers from the shore. Once only the piles remain, a shallow draft barge will come into the bay and pull the piles out. If for some reason the piles cannot be pulled they will be cut off by commercial divers at the mudline.

5.01c METHODS OF CONSTRUCTION

The existing dock will be removed as soon as one of the access docks is functional. The decking and pile caps will be removed from shore. The pilings will be pulled by a small barge and if the pilings prove too hard to pull out they will be cut off at mudline by divers."

Zoning: The master plan for the island has been submitted to DPNR for review. This plan shows the relationship of the docks to the proposed buildings and island features. The intent is for the northern barge landing to be used until such time the permanent barge landing can be built on the southeastern side of the island. The dock to the southeast is to provide a permanent barge landing location and quick access from LSJ. The dock on the western side of the island is for access by employees and persons coming from the island of St. Thomas. By having docks on both sides of the island there will always be

access in the event seas are extremely rough from the south making the southern dock unusable or from the west making the Christmas Cove Dock unusable.

As shown in the Master Plan (shown below), there is a residential cottage and a woodshed and machine shop adjacent to the western dock. And there is a residential cottage associated with the southeastern dock.



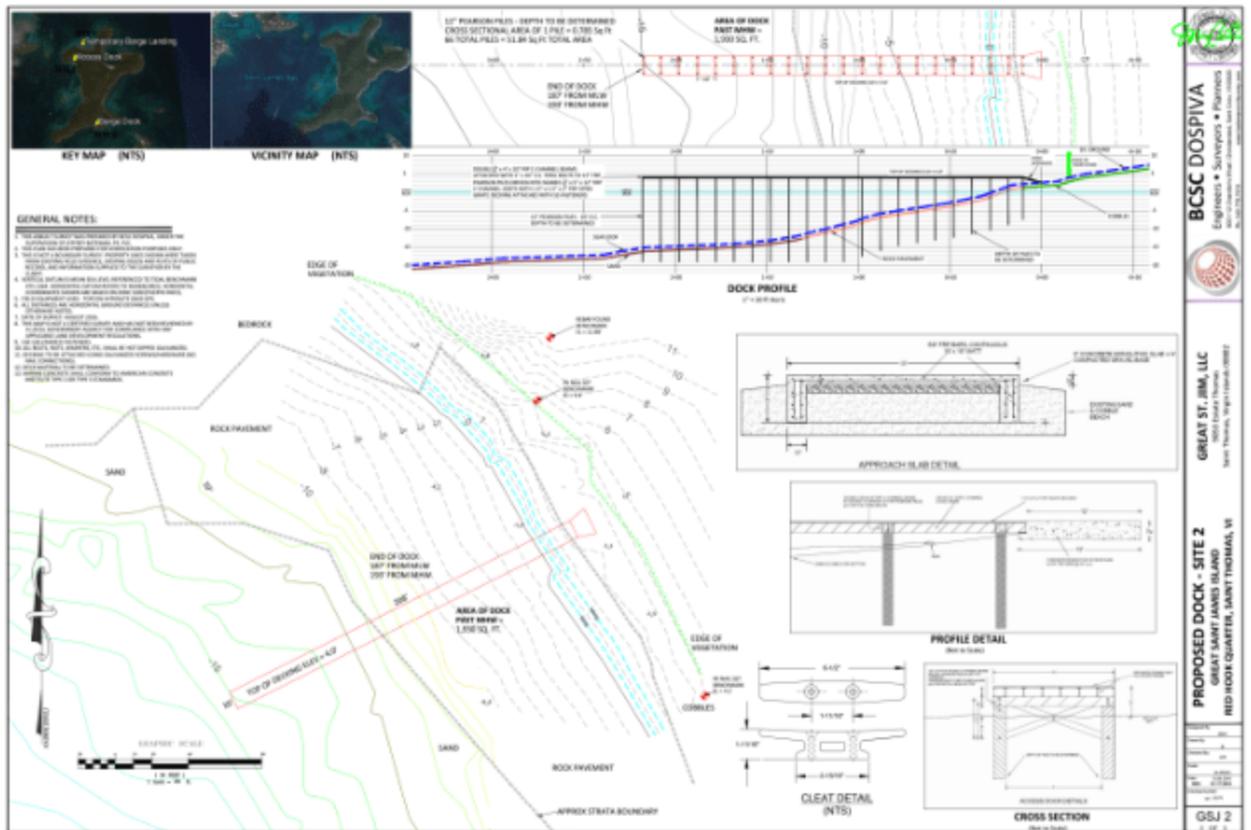
L&WD2: The agent for the application, Erika Kellerhals, email address is [REDACTED]. This has been added to Form L&WD2.

Legal

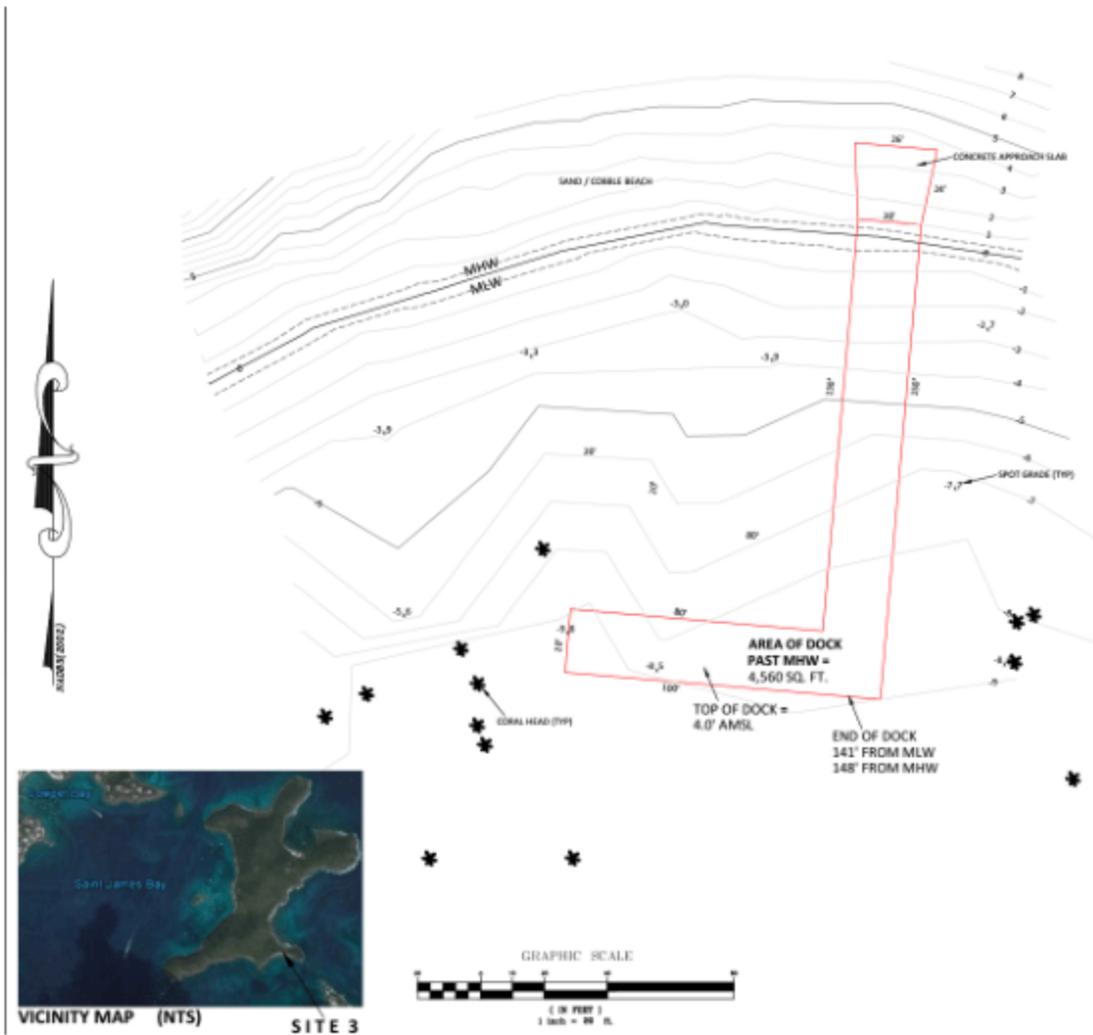
- A. Please find updated IRB Clearance Letter attached which is later than July 1, 2017.
- B. Articles of Organization and Operating Agreement Great St. Jim, LLC. Are attached.
- C. Corporate documents for Poplar, Inc.
- D. Documents Authorizing Jeffrey Epstein to sign for Poplar, Inc. are attached.
- E. Please find Letter of Existence for Great St. Jim, LLC, and Letter of Good Standing for Poplar, Inc. attached.
- F. Updated Property Tax Letter is attached.
- G. Please find the Deed attached.

Drawings:

1. Dock Site 1: The bollards will be constructed as shown in the detail in the upper right side of the page. The bollards will have a 3' deep 18" diameter footer with a 4' bollard to tie vessels to. These bollards are on the shoreline and are not off shore and therefore will have no impact on navigation. Offshore there are mooring buoys. The detail for the mooring buoys are shown in the lower left of the drawing. There are no bollards to be placed offshore. The only structures offshore are the mooring buoys, which consist of helix type anchors, floating lines, and mooring balls.
2. Dock Site 2: A full longitudinal section and piling plan has been added. A total of sixty-six 12" diameter Pearson piles will be driven.



3. Dock Site 3: The dock site plan is to scale and the distance to corals is based on having the surveyor survey the corals in, a snorkeler in the water holding the rod so each ESA coral could be accurately marked. This was done so the most accurate location could be used to place the dock since GPS has a potential error. The ESA corals are those shown by the stars below. The closest coral is off the northwest corner of the "L" and is 25' from the dock in between 7' and 8' of water depth. Since vessels which would be accessing this side of the dock should have a maximum draft of 3' this should not pose a problem for this coral. During construction barges will be positioned to the south and should not impact this or the other corals.

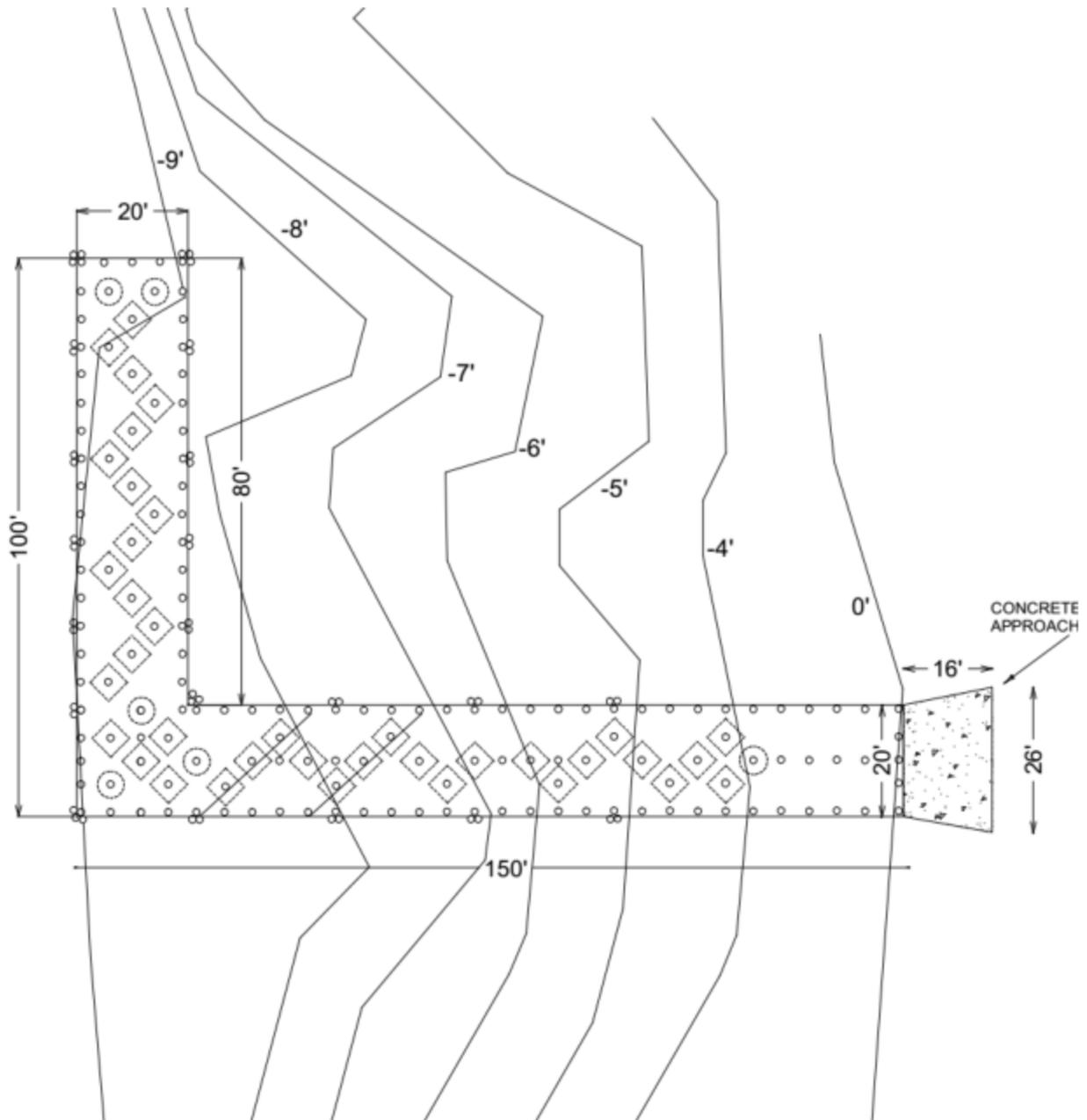


A longitudinal cross section of the 100' "T" section has been added to the drawing.

Barges will approach the dock from the south and lower their ramps onto the dock structure. The width of the dock will allow for such a landing. A drawing has been added which shows the configuration of a barge landing at the dock.

The piles are part of the wave attenuator system. There are actually 43 piles associated with the system, the drawing has been clarified to show this (all pile driving will be with a vibratory hammer. Pearson piles must be driven with vibratory hammers and therefore will limit resonance during pile driving).

The dock has a total of 152 in order to support the 70,000 ton weight requirement. The dock and the attenuator/reef system have a total of 195 piles.



The presence of the cay in STEER and the Area of Particular Concern is discussed in Section 5.02c. The purpose of the wave attenuator/reef building system is to provide additional hardbottom to allow for coral colonization. The specification and information about the wave attenuating/reef building system is attached herewith and will be placed in the appendix of the EAR.

Pearson Sustainable Solutions

ARTIFICIAL REEFS

“When Marine Ecosystems were first being developed, it was just another artificial reef. However, over time they quickly expanded to areas that entail: wave attenuation, snorkeling reefs, oyster reef

restoration, mitigation, shoreline stabilization, personal dock reef, coral reef restoration and to be used as a research tool.

Our EcoSystems are a culmination of 22 years worth of work in designing and deploying over 35,000 artificial reefs. Its complex (rugosity) design allows small marine animals to seek shelter and protection from larger predators and is ideal for defusing wave energy above the water line. This allows you to place an ecosystems in a high-wave energy area without worry about a storm event damage. The Florida Limestone rock used replicates natural reef substrate and PH. The EcoSystems create an environment for all marine life to attach and this does include boring animals which was something no other artificial reef out there has been able to do. The pile mounted design, utilizing a Pearson Piling mount system, guarantees the unit will stay upright and not sink into the bottom as well as provide proper flushing and creature mobilization.”





EAR:

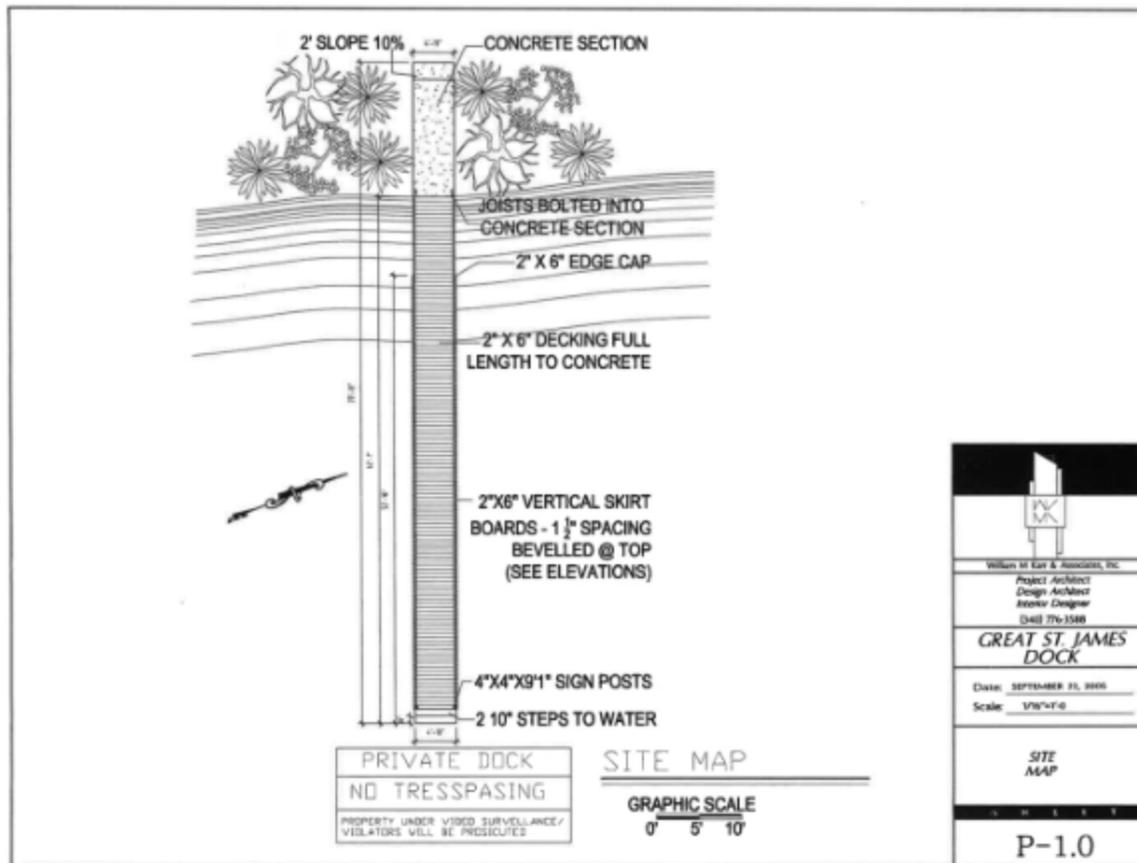
Section 3: The existing dock is discussed in detail in Section 3, see below and we will add the as-built to the EAR and a copy has been submitted herewith;

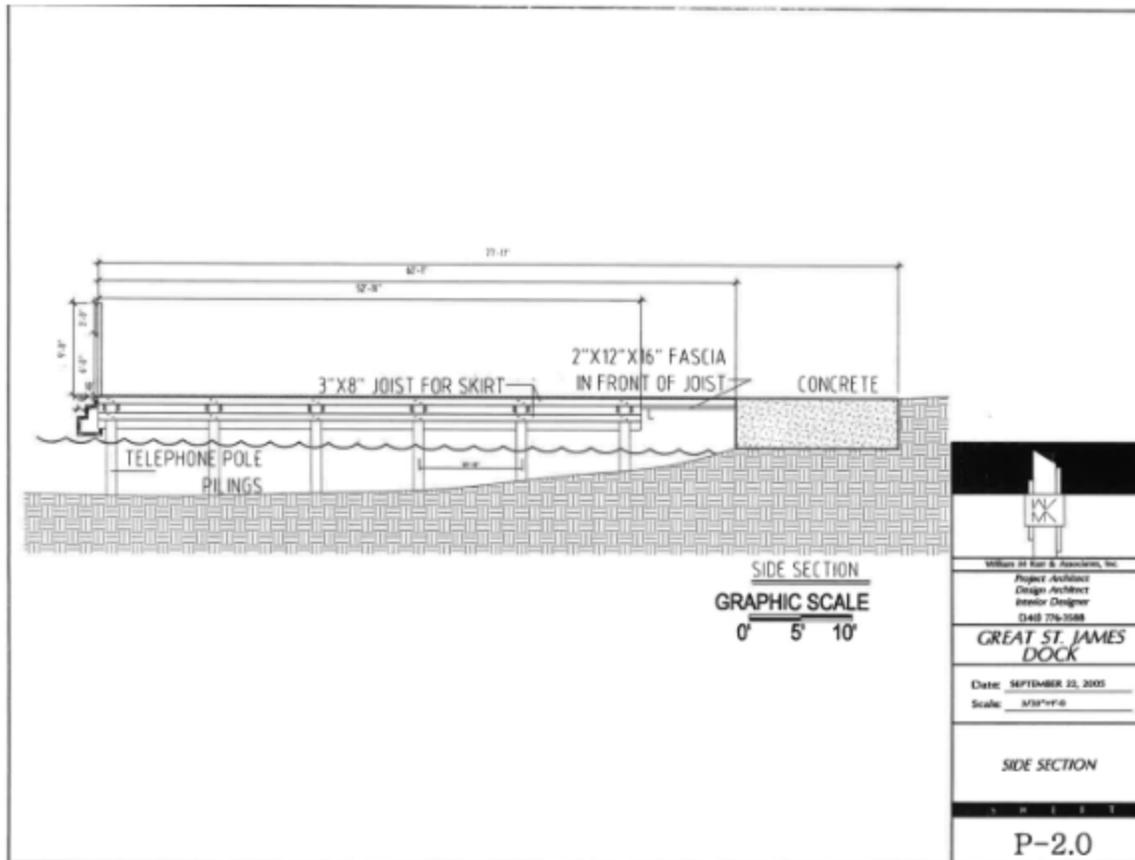
“3.00 ABSTRACT

Great St. Jim, LLC is seeking to construct two docks, one of which is a combination dock/ barge landing, and a temporary barge landing to provide access to Great St. James Island.

There is currently a small pile-supported dock located within Shallow Bay on the north side of the island. The bay is very shallow and vessels accessing the dock have damaged the shallow seagrass beds within the bay. At one time, there had been a concrete bulkhead at the shoreline with a small floating dock. The previous owner submitted an application for the existing dock which was approved by DPNR’s Division of Coastal Zone Management, but was not approved by the U.S. Army Corps of Engineers due to objections by National Marine Fisheries because of the shallowness of the bay. The dock was constructed by the previous owner despite not receiving the federal permit and notices were issued by the USACE requesting the removal of the unpermitted structure. The dock however was never removed. The applicant, understands the issues with the existing dock and is proposing to remove the dock as soon as another dock is constructed and usable. “

An as built of this existing dock is attached and will be placed in Section 5.02 of the EAR and is shown below.



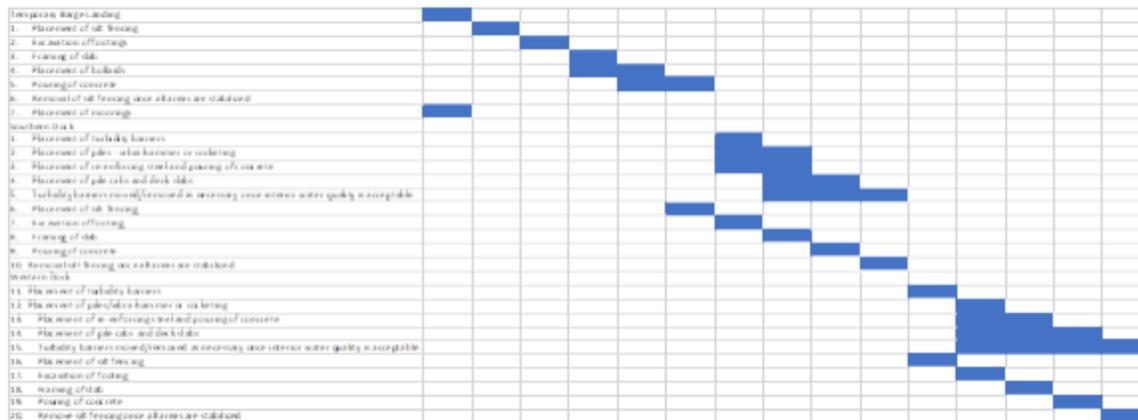


Section 4: The temporary barge landing is proposed so that it can be built immediately and used while the other docks are being constructed. The temporary barge landing has minimal impact and can be quickly constructed. This site is however not suitable as a long-term barge landing due to its exposure to waves and wakes created by ferries and large vessels passing through the Current Cut. Barges cannot stay but for very short durations as things are loaded and unloaded. The southeastern dock is to be used for direct access between LSJ and GSJ and as the permanent barge landing. The western dock is for access by island employees and others coming from St. Thomas. Both docks have residential structures in close proximity. Having both docks allows for access to the island under all sea conditions. If rough seas approach from the south making the southern dock unusable vessels can land on the Christmas Cove dock. When seas approach from the west and make use of the Christmas Cove dock difficult vessels can use the southeastern dock.

Section 5: The old concrete pile which is in the shallow depression near the shore can be removed as part of the project as mitigation, this pile moves with significant storms and does not have any notable colonization. There are two more piles which are stable and are colonized by corals and should be left in place to minimize coral impact.

The ESA listed corals were actually surveyed by the surveyor/engineer to obtain exact locations in relationship with the placement of the docking structure. A snorkeler positioned a survey rod immediately adjacent to the coral, so its exact location could be mapped. The coral locations in relationship with the dock should be correct. The dock was purposely designed to avoid ESA listed corals and minimize over all coral impact.

A graphic presentation of the project work plan/schedule is shown below and has been placed in the revised EAR.



Section 6. The dock structure has 152 piles and the wave attenuator actually has only 43 piles, the drawing has been clarified to show this more clearly (attached). The docks have been made as small as possible to meet their functions and to allow for access into deep enough water so that no propwash erosion or groundings will occur. The southern dock had to be made large enough and substantial enough so that barges could land on it and, so it would have the structural integrity for large vehicles to drive on and off barges. The dock has been designed by structural engineers for a 70,000 ton weight tolerance.

The western dock is intended to provide access to the resident and his staff. The dock has been extended into enough water depth to get beyond the shallow reef and provide safe water depth for the owners XXX' ferry which transports the island employees.

The master plan which has been submitted to CZM for approval shows the proposed uses on the island.

Section 7. The construction of the docks will have minimal waste production. The wood and decking which will be removed from the dock which will be demolished will be recycled and reused on the island and the piles will be used in landscaping. The ramp for the temporary barge landing will not be removed unless required by the agencies. Ramp would not be used unless there were an emergency and the southern barge ramp was unusable. If the barge ramp is removed the concrete would be broken up and buried in the islands disposal site. It will have no impact on public waste disposal facilities.

The roads on GSJ are private and are not public roadways. The construction of the barge ramp, the docks and their use will not affect public roads. The island roadways are hard packed dirt roadways and most traffic on the roadways are smaller gators, and golf carts to transport employees. Upland development including the roadways and roadway stabilization is discussed in the Master Plan application.

The western dock has been located as far north in Christmas Cove as possible while minimizing benthic impacts. The bay is heavily used because it is an excellent mooring area and therefore it is also a suitable location for a dock. Vessels will only approach the dock at low speeds. Signage will be placed on the dock noting that it is an active private dock and to use caution if swimming or snorkeling near the

dock. Most of the activity in Christmas Cove occurs to the south. The owner access to the island and the public use of the moorings should be able to co-exist.

We hope that we have adequately address the listed deficiencies and concerns. Early advice concerning your decision in this matter will be appreciated.

Respectfully submitted,