Colonel Jason A. Kirk
District Commander
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019

RE: Limetree Bay Terminals LLC (SAJ-2017-00416 (SP-JCM))

Dear Colonel Kirk:

This is in reference to Permit Application No. SAJ-2017-00416 (SP-JCM) by Mr. Forgan McIntosh on behalf of Limetree Bay Terminals LLC for the construction of a single point mooring and an underwater pipeline system for the offshore transfer of bulk fuel from very large bulk carriers to the existing facilities at Limetree Bay Marine without the need to transfer the fuel to smaller vessels.

The U.S. Environmental Protection Agency (EPA) understands that the strategic re-utilization of the former HOVENSA site is of major importance to the economic health and well-being of the U.S. Virgin Islands community. We also understand this significance is punctuated by the devastating financial and humanitarian crisis on the Island, resulting from Hurricanes Irma and Maria.

EPA is also aware of the strong culture of natural resource stewardship on the Island and the great sensitivity to carefully managing environmental challenges. With that said, after reviewing the information available for this project, the EPA is concerned about its possibly significant environmental impacts, which must be considered under the National Environmental Policy Act (NEPA). These include the apparent lack of alternatives considered to achieve the project purpose, impacts from the dragging of the mooring chain, and safety issues. In addition, the potential impacts that the installation and operation of the mooring point and fuel transfer system, as well as the presence of very large fuel carriers (with drafts up to -76 feet) in the channel could have on water quality in the area must be closely evaluated. This is of particular importance given the presence of coral species listed under the Endangered Species Act (ESA) and other significant resources within the project area. Furthermore, while the public notice for the project mentioned potential mitigation plans to compensate for possible impacts to ESA-listed corals, the included information was largely conceptual.

In order to consider the complex data required to properly evaluate the potential impacts of this project, the US Environmental Protection Agency (EPA) has determined that we will need additional time in order to provide substantive comments. Therefore, we hereby request a 30-day extension to the comment period.

We look forward to continuing working with you and your staff on this project. If you have any questions or require additional information on this matter, please contact me at (212) 637-5000 or have your staff contact Ms. Carmen G. Guerrero, Director of the Caribbean Environmental Protection Division, at (787) 977-5870.

Sincerely,

Peter D. Lopez
Regional Administrator

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