



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF OCEAN AND COASTAL RESOURCE MANAGEMENT
Silver Spring, Maryland 20910

JAN 15 2009

Robert S. Mathes
Commissioner, U.S. Virgin Islands Department
of Planning and Natural Resources
8100 Lindberg Bay
St. Thomas, Virgin Islands 00802

Dear Commissioner Mathes:

Enclosed are the final evaluation findings for the U.S. Virgin Islands Coastal Zone Management Program (VICZMP) for the period from May 2003 through November 2007. The evaluation reviewed only the staffing issues involved with the operation and management of the VICZMP.

The fundamental conclusion of this evaluation is that the VICZMP continues to have difficulty attracting, hiring, and retaining well-qualified staff in sufficient numbers, thus hampering effective implementation of the program. This document contains two recommendations, one of which is mandatory.

We appreciate your cooperation and assistance and that of your staff during the accomplishment of this evaluation.

Sincerely,

David M. Kennedy
Director

Enclosure

cc: Janice Hodge, Director of Coastal Zone Management, U.S. Virgin Islands Department of
Planning and Natural Resources
Dana Wusinich-Mendez, OCRM Coastal Programs Division

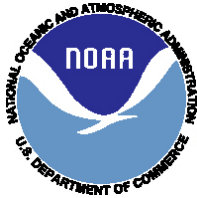


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FINAL Evaluation Findings
Virgin Islands Coastal Zone Management Program
May 2003 through November 2007

January 2009



Office of Ocean and Coastal Resource Management
National Ocean Service
National Oceanic and Atmospheric Administration
U.S. Department of Commerce

TABLE OF CONTENTS

I. EXECUTIVE SUMMARY	1
II. PROGRAM REVIEW PROCEDURES	2
A. Overview.....	2
B. Document Review and Issue Development	2
C. Site Visit to the U.S. Virgin Islands	3
III. COASTAL MANAGEMENT PROGRAM DESCRIPTION	4
IV. REVIEW FINDINGS, ACCOMPLISHMENTS, AND RECOMMENDATIONS	5
V. CONCLUSION.....	13
VI. APPENDICES	14
Appendix A. Persons and Institutions Contacted	14
Appendix B. Persons Attending the Public Meetings.....	16
Appendix C. NOAA’s Response to Written Comments.....	17

I. EXECUTIVE SUMMARY

Section 312 of the Coastal Zone Management Act requires NOAA's Office of Ocean and Coastal Resource Management (OCRM) to conduct periodic evaluations of the performance of states and territories with federally-approved coastal management programs. This review examined only the staffing issues involved with the operation and management of the Virgin Islands Coastal Zone Management Program (VICZMP) by the U.S. Virgin Islands Department of Planning and Natural Resources, the program's designated lead agency, for the period of May 2003 through November 2007. This document describes the evaluation findings of the Director of NOAA's OCRM with respect to VICZMP's staffing and capacity to implement its approved program during the review period.

II. PROGRAM REVIEW PROCEDURES

A. OVERVIEW

NOAA's Office of Ocean and Coastal Resource Management (OCRM) began its review of the Virgin Islands Coastal Zone Management Program (VICZMP) in September 2007. The evaluation process involves four distinct components:

- An initial document review and identification of specific issues of particular concern;
- A site visit to the Virgin Islands, including interviews and public meetings;
- Development of draft evaluation findings; and
- Preparation of the final evaluation findings, partly based on comments from the territory regarding the content and timetables of recommendations specified in the draft document.

The recommendations made by this evaluation appear in boxes and bold type and follow the findings section where facts relevant to the recommendation are discussed. The recommendations may be of two types:

Necessary Actions address programmatic requirements of the CZMA's implementing regulations and of the VICZMP approved by NOAA. These must be carried out by the date(s) specified.

Program Suggestions describe actions that OCRM believes would improve the program, but which are not mandatory at this time. If no dates are indicated, the Virgin Islands Department of Planning and Natural Resources (DPNR) is expected to have considered these Program Suggestions by the time of the next CZMA §312 evaluation.

Failure to address Necessary Actions may result in a future finding of non-adherence and the invoking of interim sanctions, as specified in CZMA §312(c). Program Suggestions that are reiterated in consecutive evaluations to address continuing problems may be elevated to Necessary Actions. OCRM will consider the findings in this evaluation document when making future financial award decisions relative to VICZMP.

B. DOCUMENT REVIEW AND ISSUE DEVELOPMENT

The evaluation team reviewed a wide variety of documents prior to the site visit, including: (1) the federally-approved Environmental Impact Statement and program documents; (2) financial assistance awards and work products; (3) semi-annual performance reports; (4) official correspondence; and (5) relevant publications on natural resource management issues in the Virgin Islands. Based on this review and on discussions with OCRM staff, the evaluation team identified VICZMP's staffing and

capacity to implement its approved program as the most critical and overarching issues that must be evaluated and addressed before the rest of the approved VICZMP is evaluated.

C. SITE VISIT TO THE U.S. VIRGIN ISLANDS

Notification of the scheduled evaluation was sent to VICZMP, DPNR, relevant territorial and federal environmental agencies, the Virgin Islands congressional delegate and regional newspapers. VICZMP published notification of the evaluation and of the scheduled public meetings. In addition, a notice of OCRM's "intent to evaluate" was published in the *Federal Register* on October 12, 2007.

The site visit to the Virgin Islands was conducted on December 4-7, 2007. Ms. Rosemarie McKeeby, Evaluation Team Leader, OCRM National Policy and Evaluation Division, and Ms. Dana Wusinich-Mendez, Program Specialist, OCRM Coastal Programs Division, formed the evaluation team.

During the course of the site visit, the evaluation team interviewed VICZMP staff, representatives of federal, territorial and local government agencies, and members of institutions and interest groups involved with or affected by VICZMP. Appendix A lists individuals contacted during this review.

As required by the CZMA, OCRM held advertised public meetings as follows:

- (1) Tuesday, December 4, 2007, at 6:00 p.m., at the Cyril E. King Airport Terminal Building, Second Floor, Department of Planning and Natural Resources Conference Room, 8100 Lindberg Bay, St. Thomas;
- (2) Wednesday, December 5, 2007, at 6:00 p.m., at the Henry Rohlsen Airport, Second Floor, Port Authority Conference Room, St. Croix; and
- (3) Thursday, December 6, 2007, at 6:00 p.m., at the St. John Legislature Conference Room, St. John.

The meetings gave members of the general public the opportunity to express their opinions about the overall operation and management of VICZMP. Appendix B lists individuals who registered at the meetings. Written comments submitted during this review are addressed in Appendix C.

The evaluation team gratefully acknowledges the support of VICZMP staff with site visit planning and logistics.

III. COASTAL ZONE MANAGEMENT PROGRAM DESCRIPTION

The U.S. Virgin Islands are located approximately 1,000 miles southeast of Miami at the eastern end of the Caribbean Archipelago. The territory contains three large islands – St. Thomas, St. Croix, and St. John – and approximately 50 small islets and cays. Volcanic in origin, the Virgin Islands have no rivers, streams, or lakes, but feature steep ridges and abundant coral reefs. The islands’ ecosystems, which include extensive mangroves, salt ponds, and coral reefs, have great natural and economic value.

The Virgin Islands coastal zone includes the islands and the waters extending seaward to the outer limits of the U.S. territorial sea. The coastal zone incorporates open waters, tidal flats, estuaries, bays, inlets, wetlands, lagoons, beaches, dunes, bluffs, and upland areas. The inland coastal zone boundary is divided into two tiers. The first tier is composed of a relatively narrow strip of land along the coast as well as all offshore islands and cays, except federal lands. All development activity in Tier I is subject to a Virgin Islands coastal zone management permit, which is issued by the Coastal Zone Management Commission. The second tier comprises the interior portions of the three main islands. Within Tier II, activities are subject to review by the Department of Public Works for compliance with earth change, subdivision, and zoning requirements.

NOAA approved the Virgin Islands Coastal Zone Management Program (VICZMP) in 1979. The Virgin Islands Department of Planning and Natural Resources (DPNR) is the lead administrative agency for VICZMP. The DPNR Commissioner is responsible for: (1) directing VICZMP activities; (2) approving or denying all earth change permits and minor coastal zone permits; and (3) taking all enforcement actions arising from major and minor permit implementation. Major coastal zone management permits are issued by individual Coastal Zone Management Committees for each of the three main islands. Together, the three individual committees compose the Coastal Zone Management Commission, which is empowered to promulgate rules and regulations and to provide policy direction and leadership on coastal management issues.

IV. REVIEW FINDINGS AND RECOMMENDATIONS

Staffing and Program Implementation

Successful coastal zone management program implementation is impossible without a well-qualified staff. The Virgin Islands Coastal Zone Management Program (VICZMP) historically has had considerable difficulty attracting, hiring, and retaining staff in sufficient numbers. The Office of Ocean and Coastal Resource Management's (OCRM) 2003 evaluation of VICZMP concluded that inadequate staffing either caused or exacerbated all of the issues identified in the findings.

In 2007, OCRM anticipated conducting a full evaluation of VICZMP. However, upon reviewing the previous evaluation findings as well as the program's staffing levels and capacity during the current review period, staff determined that a single-issue evaluation was necessary. Therefore, OCRM notified VICZMP that it would conduct an evaluation focusing on the program's staffing constraints.

The 2003 final evaluation findings included the following Necessary Action:

VICZMP must continue to fill critical vacancies with appropriate candidates as quickly as possible. VICZMP should identify current vacancies, priorities among vacancies, and a schedule for filling vacant positions within the program. This schedule must be submitted to OCRM no later than 30 days after the territory receives the final evaluation findings. Efforts to hire priority positions should commence immediately thereafter.

The final findings also contained a table of staff positions vacant at the time of the 2003 site visit. During the December 2007 evaluation site visit, VICZMP provided the evaluation team with an update of the personnel actions taken by the program during the review period (see table below).

Positions Vacant in 2003	Position Status in 2007
1 Permit Coordinator	Vacant
2 Permit Inspectors for St. Thomas/St. John	Vacant
2 Permit Inspectors for St. Croix	Vacant
1 Environmental Engineer	Filled
1 Water Quality Permit Inspector	Incorporated into existing position
2 Attorneys	Filled
1 Paralegal	Filled
½ Legal Secretary	Incorporated into existing position
½ Education and Outreach Coordinator	NOAA Coral Fellow
1 Secretary	Filled
1 Geographic Information System (GIS) Technician	Vacant
1 East End Marine Park Administrative Assistant	Filled

1 East End Marine Park Interpretive Officer	Filled
1 East End Marine Park Enforcement Officer	Vacant
1 East End Marine Park Marine Biologist	Filled half-time

The Special Projects Coordinator resigned in June 2007 and that position was vacant at the time of the evaluation site visit as well.

Of the 17 vacancies identified in the previous evaluation findings, VICZMP filled seven full-time positions and one half-time position during the current review period. Duties for one and a half vacancies were incorporated into existing positions, and a NOAA Coral Fellow began serving as a half-time Education and Outreach Coordinator. Seven of the original vacancies, including a Permit Coordinator and four Permit Inspectors, remained vacant at the time of the 2007 site visit. Additionally, staff resignations during the review period brought the total number of vacant positions at the time of the site visit to nine. Of the nine vacancies, VICZMP proposed to fill five through recruitment and three through promotion of existing staff. One position had a recruit identified who had been awaiting Department of Personnel approval for more than a year.

Apart from these vacancies for existing positions, five new positions that need to be created to address major program deficiencies were identified, including:

- VICZMP grants coordinator – would oversee all grants management activity in the CZM Program including proposal development and submission, post award actions, performance reporting [this position has been created and filled since the evaluation site visit]
- VICZMP community outreach coordinator – to work with VICZMP stakeholders such as landowners, developers and construction workers to increase awareness and understanding of CZM programs, regulations and procedures
- two additional permit inspectors – one of these positions should focus completely on permit activities on St. John
- GIS Planner – this role was previously performed by the NOAA Coastal Management Fellow

The hiring process itself has been a significant hurdle for VICZMP. The current territorial administration is attempting to streamline the personnel process, and it is hoped that these efforts will provide for more efficiency in hiring new staff. Staff noted that the procedure for filling vacant positions has been clearly defined and has become easier to track. The streamlined process is as follows:

For an existing position:

- Job vacancy posted in-house for ten days;
- Job vacancy posted at the Department of Personnel for ten days;
- After 10 days, certification listing of all eligible candidates is requested from Department of Personnel;
- Eligible candidates are interviewed;

- If a candidate is chosen, a Notice of Personnel Action (NOPA) is processed through the Department of Planning and Natural Resources (DPNR) Human Resources Office;
- The Department Head and Business Office Director must sign the NOPA and transmit it to the Department of Personnel Director;
- Upon approval by the Department of Personnel, the NOPA is forwarded to the Governor for signature;
- After NOPA is signed by the Governor, it is returned to the Department; and
- The candidate may begin employment.

For a position that needs to be created:

- The division submits a request to the DPNR Human Resources Office for the position to be created;
- The Human Resources Office requests a budget control number for the position through the Office of Management and Budget; and
- Once the budget control number is obtained, the hiring process may proceed as described above for an existing position.

In addition to working through the territory's hiring process, VICZMP made an effort to increase staff capacity through participation in two of NOAA's fellowship programs. The Coral Reef Management Fellowship Program responds to the need for additional coral reef management capacity and capability in the U.S. flag islands, and the Coastal Management Fellowship Program provides project assistance to approved coastal management programs. At the time of the site visit, the Virgin Islands Coral Reef Management Fellow was serving as an Outreach Coordinator, and the Coastal Management Fellow was serving as a GIS Coordinator.

VICZMP also has employed professional service agreements and contracts in an attempt to compensate for vacancies. These mechanisms require the program to work closely with the Department of Property and Procurement to publish requests for proposals and to identify qualified consultants. Unfortunately, the process to engage consultants is arduous, extremely time consuming, and does not always produce the desired result. For example, after being awarded a contract to complete several tasks for VICZMP, a consulting firm was unable to produce the deliverables. In another instance, after a contractor was identified and signatures secured, the territory's administration changed, requiring staff to execute a new contract.

Another problem commonly encountered with the hiring process is the salary range. Often, the salary range associated with a particular position is too low to attract the expertise required. Furthermore, qualification requirements can be difficult to meet. For example, a prospective VICZMP employee had the field experience necessary for a position of interest. However, his experience did not count towards the requirement because it was gained by working with a family member.

OCRM recognizes that VICZMP has tried to address its staffing problems. Toward the end of the review period, a new Commissioner was appointed to DPNR. He soon re-

hired a former VICZMP manager to manage the program. She is extremely well-qualified and capable, and the evaluation team repeatedly heard from VICZMP partners and constituents how pleased they were that she had returned to the program. However, VICZMP has been, and remains, in a difficult position with regard to staffing and capacity to implement the approved program. Upon review of VICZMP during the current review period, the evaluation team found a program with nine vacancies, five of which are permitting staff. The total number of vacancies would be even higher if several duties had not been incorporated into existing positions. While such action has the benefit of apparently reducing the program's total number of vacancies, it runs the risk of overburdening staff. Chronically overtaxed staff may seek other professional opportunities, thus leaving the program with as many, if not more, of the vacancies that it sought to eliminate. The VICZMP Manager has proposed to fill several vacancies by promoting existing staff. While OCRM fully supports that decision, it must be noted that promoted staff will leave vacancies that will subsequently need to be backfilled. As described above, the program also struggles with factors beyond its control, such as lengthy hiring processes, uncompetitive salaries, and, at times, confusing qualification requirements. Additionally, professional service agreements and contracts require a huge investment of staff time with little guarantee of acceptable results.

The 2003 evaluation findings noted that the program's staffing shortage was "of greatest concern" to OCRM and that the office considered the improvement of the VICZMP's staffing situation to be critical to the implementation of the evaluation's recommendations. Unfortunately, the 2007 evaluation team finds that the fundamental conclusions of the 2003 evaluation regarding the VICZMP's staffing and ability to implement the program remain unchanged four years later. OCRM recognizes that the VICZMP faces significant challenges, not all of which are under its control, in attracting, hiring, and retaining sufficient numbers of well-qualified staff. However, the VICZMP cannot be effectively implemented without appropriate staff resources, and the program cannot continue in this manner. Ineffective implementation because of staffing shortages is evident in the following programmatic areas:

Grants Management

OCRM awards grants to federally-approved coastal management programs to assist with program implementation and enhancement. OCRM also requires coastal management programs to submit semi-annual performance reports for each grant; the reports present consolidated information about accomplishments related to a program's financial assistance awards. Grants management is a basic function of every coastal management program.

VICZMP's chronic staffing shortfalls rendered the program unable to fulfill its grants management requirements during the review period, resulting in a significant loss of federal funds. In FY05, \$472,417 from VICZMP's coastal zone management award was returned to OCRM. The OCRM withheld \$393,000 from the program's FY06 grant award primarily for failure to comply with reporting requirements. In FY07, OCRM withheld \$162,000 in coastal zone management funds from the program because of

inadequate reporting and failure to accomplish certain grant tasks. By the end of March 2007, VICZMP staff had submitted several performance reports and managed to forestall further loss of federal funds from the program. At the time of the site visit, efforts were underway by the VICZMP to meet the conditions necessary for the removal of special award conditions so that the federal funds can be used for the purposes originally intended.

Permitting, Monitoring and Enforcement

During the review period, VICZMP began development of a territorial master coastal zone management database that will track all permit applications, permits, modifications, assignments, leases, violations and other related activities. The database will operate from two interconnected servers on St. Croix and St. Thomas. At the time of the site visit, staff estimated that the database would be operational and accessible to the public within a year.

In addition to database development, staff conducted permitting workshops for architects, planners, contractors and builders. The workshops provided information on the permitting process, the goals of coastal zone management rules and regulations, and the federal consistency provision. Workshop attendees received packages with brochures, fact sheets, permit forms, and on-site sewage disposal rules and regulations.

The 2003 VICZMP evaluation findings recommended that the territory prioritize enforcement of program statutes by ensuring that enforcement staff whose salaries come from the coastal zone management grant spend their time on VICZMP enforcement. In response, enforcement officers began maintaining a data log that documents all enforcement and monitoring activities undertaken for VICMZIP.

Permitting, monitoring, and enforcement are critical elements of every coastal management program. While VICZMP worked to improve its permitting, monitoring, and enforcement activities during the review period through efforts such as the permitting database and enforcement log, it was clear to the evaluation team that the program's staff shortage was severely impacting these areas of the program. VICZMP does not have sufficient capacity to process permit applications, monitor projects for compliance with permit conditions, or provide adequate enforcement when violations occur. If these issues are not addressed, VICZMP stands to lose credibility, and illegal activities and actions may go unnoticed and/or uncorrected.

Areas of Particular Concern

In the 1990s, VICZMP undertook a comprehensive effort to identify the most important coastal resources and areas of competing uses on each island through the designation of 18 areas of particular concern (APC). While successful management plans were developed and implemented for a few of the APCs, progress on implementing additional plans stalled. The 2003 VICZMP evaluation findings contained the following Necessary Action:

Within six months of hiring an Environmental Planner, VICZMP must submit to OCRM a strategy for developing enforceable APC management plans. The strategy should prioritize APC management plan development and set out a schedule for initiation and completion of these plans. It should also describe how the process will be tailored to various types of APCs. Other components that should be found in the strategy include:

- Issue identification and prioritization of APC sites based on adequate input from all relevant stakeholders;
- A plan for public involvement in this process and for enhancing public support of APC management;
- A feasible approach to developing enforceable components for APCs within the system; and
- Identification of roles and responsibilities of VICZMP staff, other DPNR staff and any contractors in developing the plans, rules and regulations.

Existing plans should be used whenever possible to provide information on the sites and appropriate recommendations from those plans should be considered in developing new ones.

VICZMP began addressing this Necessary Action in March 2006. At that time, an APC Special Projects Coordinator was tasked with creating a strategy for developing enforceable APC management plans. A policy review was undertaken and the initial strategy was developed in December 2006. Phase I implementation of the revised APC program strategy began, and then the. As the position remained vacant at the time of the December 2007 site visit, no additional work had been undertaken to complete the tasks outlined in the necessary action above. This is another example of how VICZMP's staffing shortage has hampered the program. APC System implementation will not occur without a qualified coordinator.

The following summary table groups current USVI CZM program vacancies into three categories:

- 1) existing positions that are vacant and have secured funding to support them;
- 2) existing positions that are vacant but that no longer have funding allocated to support them; and
- 3) new positions recommended for development.

VI CZM Program Vacancies for 2007-2008 312 Program Evaluation		
Funded existing vacancies	Unfunded existing vacancies	Recommended new positions
Permits coordinator	Permits inspector for St. Croix	Community outreach coordinator for EEMP
Permits inspector for St. Croix	GIS technician	Permits inspector for St. Thomas
Special projects coordinator for APC implementation		Permits inspector for St. John
Marine resource ecologist		GIS planner
Outreach coordinator		EEMP enforcement officer

Unless the VICZMP's staffing shortage is addressed in a significant and lasting way, OCRM will need to review and reconsider the continued eligibility of the program under the CZMA. As the previous evaluation's conclusions regarding staffing remain unchanged, the primary recommendation remains largely unchanged as well.

Necessary Action: VICZMP must fill all funded vacancies with well-qualified candidates by January 9, 2011. These funded vacancies include the following five positions: a permits coordinator, a permits inspector for St. Croix, a Special Projects Coordinator who will oversee the implementation of the APC system, a marine resource ecologist, and an outreach coordinator. By February 9, 2009, VICZMP must develop and submit a schedule for filling these five vacancies to OCRM. Once approved by OCRM, efforts to hire priority positions must begin immediately. VICZMP must report quarterly to OCRM on its progress in meeting the schedule. If OCRM determines that progress in addressing the VICZMP's staffing shortage is not adequate, OCRM may immediately initiate a full evaluation of the program. If the evaluation finds that the U.S. Virgin Islands is failing to implement and enforce its coastal management program as approved by NOAA, NOAA may initiate the process of imposing sanctions pursuant to the CZMA.

Program Suggestion: In order for the VICZMP to effectively manage its programs in the coastal zone, there are seven (7) additional positions that should be filled. Two of these are existing positions that were staffed in the past but no longer have funding allocated to support them. These are a Permits Inspector for St. Croix and a GIS Technician. The need to develop five new positions in the CZM program was also identified in the evaluation. These are: a Community Outreach Coordinator for the East End Marine Park, an additional Permits Inspector for St. Thomas, an additional Permits Inspector dedicated to and based on St. John, a GIS Planner, and an additional Enforcement Officer dedicated to the East End Marine Park on St. Croix. OCRM strongly recommends that the VICZMP work to fill these seven positions over the next five years, starting with the identification of funds to support these positions.

V. CONCLUSION

For the reasons stated herein, I find that the Virgin Islands Coastal Zone Management Program (VICZMP) continues to have difficulty attracting, hiring, and retaining well-qualified staff in sufficient numbers. The program's staffing shortage is of greatest concern to the Office of Ocean and Coastal Resource Management (OCRM), and OCRM considers the improvement of VICZMP's staffing situation to be critical to the successful implementation of the approved program. The VICZMP cannot be implemented in the absence of appropriate staff resources; thus, the program's ongoing staffing shortage must be addressed in a significant and lasting way.

The Necessary Action described in these findings must be addressed by the date indicated. The VICZMP is strongly encouraged to address the Program Suggestion. Failure to successfully address the Necessary Action may result in a future finding of non-adherence and the invoking of interim sanctions, as specified in CZMA §312(c). OCRM will consider the findings in this evaluation document when making future financial award decisions relative to the VICZMP.

David M. Kennedy
Director, Office of Ocean and
Coastal Resource Management

Date

VI. APPENDICES

Appendix A. People and Institutions Contacted

<u>Name</u>	<u>Affiliation</u>
Winston Adams	
Rafe Boulon	U.S. Department of the Interior/National Park Service
Winston Brathwaite	USVI Department of Planning and Natural Resources/CZM
Carolyn Browne	Environmental Association of St. Thomas/St. John
Jim Casey	U.S. Environmental Protection Agency, Region II
Sindulfo Castillo	U.S. Army Corps of Engineers, Jacksonville District
Paul Chakroff	St. Croix Environmental Association
Carol Cramer-Burke	St. Croix Environmental Association
Sharon Coldren	Coral Bay Community Council, Inc.
William Coles	USVI Department of Planning and Natural Resources
Olasee Davis	University of the Virgin Islands
Barry Devine	University of the Virgin Islands
Nick Drayton	The Ocean Conservancy
Shantel Elvi	USVI Department of Planning and Natural Resources
John Farchette	USVI Department of Planning and Natural Resources/CZM
Rhoda Felix-Nielsen	USVI Department of Planning and Natural Resources
Carol Frett	USVI Department of Planning and Natural Resources
Lloyd Gardner	University of the Virgin Islands
Jordan Gass	USVI Department of Planning and Natural Resources/CZM
Helen Gjessing	League of Women Voters of the USVI
Lucette Green	USVI Department of Planning and Natural Resources
Nellie Gumbs	USVI Department of Planning and Natural Resources
Gerald Hills	
Douglas Hodge	USVI Department of Planning and Natural Resources
Janice Hodge	USVI Department of Planning and Natural Resources/CZM
Carl Howard	USVI Department of Planning and Natural Resources
Kim Ishida	The Ocean Conservancy
Norma Jackson	USVI Department of Planning and Natural Resources/CZM
Celia Jackson-Williams	USVI Department of Planning and Natural Resources
Karlyn Langjahr	USVI Department of Planning and Natural Resources/CZM
Kemit-Amon Lewis	USVI Department of Planning and Natural Resources/CZM
Jason Magras	USVI Department of Planning and Natural Resources
Kevin Matthews	USVI Department of Planning and Natural Resources/CZM
Robert Merwin	
Wanda Mills-Bocachica	USVI Department of Planning and Natural Resources
Justin Monsanto	
Lillian Moolenaar	USVI Department of Planning and Natural Resources/CZM
Anita Nibbs	USVI Department of Planning and Natural Resources
David Olsen	USVI Department of Planning and Natural Resources

Rudy O'Reilly	U.S. Department of Agriculture
Jean-Pierre Oriol	USVI Department of Planning and Natural Resources/CZM
Dalila Patton	USVI Department of Planning and Natural Resources/CZM
Andrew Penn	
Susan Penn	
Charles Peters	
Olgen Petersen	USVI Department of Planning and Natural Resources
Michelle Pugh	Dive Experience
Norman Quinn	USVI Department of Planning and Natural Resources/CZM
Manny Ramos	USVI Department of Planning and Natural Resources/CZM
Anthony Richards	USVI Department of Planning and Natural Resources
Gregory Richards	USVI Department of Planning and Natural Resources/CZM
Tamia Rieara	
Migdalia Roach	USVI Department of Planning and Natural Resources/CZM
Edmund Roberts	
Paige Rothenberger	USVI Department of Planning and Natural Resources/CZM
Elissa Runyon	St. John Coalition
Gail Samuel-Dorsett	USVI Department of Planning and Natural Resources/CZM
Tyrone Seales	
Madaline Sewer	
Dalma Simon	Environmental Association of St. Thomas/St. John
Neil Simon	
Peggy Simonds	
Jamil Springer	USVI Department of Planning and Natural Resources/CZM
Roberto Tapia	USVI Department of Planning and Natural Resources
Marcia Taylor	University of the Virgin Islands
Joel Tutein	U.S. Department of the Interior/National Park Service
Nikia Wallace	
Norman Williams	USVI Department of Planning and Natural Resources

Appendix B. People Attending the Public Meetings

St. Thomas - Tuesday, December 4, 2007

Jose Belcher
Patrick Beuttler
Lynn Freehill
Analise LaPlace
Sean LaPlace
Jimmy Magner
Chrys Petersen

St. Croix – Wednesday, December 5, 2007

Michael Baron
Robert Bidelspacher
Hugh Bulkley
Sondra Catts
Aesha Duval
Carlos Farchette
John Farchette
Claude Gerard
Ian Lundgren
Bob Merwin
Norman Quinn
Neil Simon
Masserae Webster

St. John – Thursday, December 6, 2007

Larry Best
Mary Blazine
Sharon Coldren
Barry Divine
Roger Harland
Gerry Hills
Martha Hills
Shirley Laska
Lynda Lohr
Dan McElwee
Andrea Milam
Madaline Sewer
Marigold St. Prix

Appendix C. NOAA's Response to Written Comments

This evaluation of the Virgin Islands Coastal Zone Management Program focused solely on staffing issues and the VICZMP's capacity to implement its approved program with the staffing levels that existed throughout the review period. However, written comments were received that addressed a wide range of public concerns and were not limited to the narrow focus of the evaluation itself. Some of the concerns expressed in the written comments can be attributed directly or indirectly to the inadequate staffing levels that this evaluation has addressed, while others are about a specific topic or narrow issue not directly addressed by this evaluation. Therefore, OCRM does not believe it can fairly respond to these comments. OCRM does acknowledge receiving written comments from the following persons and thanks them for the time and effort they took to submit them. The written comments remain a part of the official records of this limited evaluation, and OCRM encourages these citizens to stay involved in the implementation of the VICZMP and to share their ongoing concerns with the coastal management program.

Helen W. Gjessing, League of Women Voters of the Virgin Islands

Michael Baron

Dr. Barbara Kojis

Karen Vahling, Coral Bay Community Council

Pamela Colon

Dan Bostdorf

Pam Gaffin

Tedd Wallace

Paul Marcell

Mary Boehm, Club Comanche, Inc.

Jose Belcher

Paul Chakroff, St. Croix Environmental Association