



United States Department of the Interior  
NATIONAL PARK SERVICE  
Virgin Islands National Park  
1300 Cruz Bay Creek  
St. John, VI 00830

April 12, 2021

Jean-Pierre L. Oriol, Commissioner  
Department of Planning and Natural Resources  
Charles W. Turnbull Regional Library  
4607 TuTu Park Mall  
St. Thomas, VI 00802

Re: NPS Request for Coastal Consistency Determination for the Repair to Cruz Bay Visitor Center, Docks, and Surrounding Grounds, St. John, U.S. Virgin Islands

Dear Commissioner Oriol:

The Virgin Islands National Park respectfully requests a Decision of Coastal Consistency for their Repair to Cruz Bay Visitor Center, Docks, and Surrounding Grounds. VIWAPA is proposing to renovate the existing visitor center repairing the components damaged by the 2017 and make the building more resilient to future storms and sea level rise. This application also requests permission to repair the aging bulkhead and replace the existing dock which were further damaged by the 2017 storms and to conduct maintenance dredging of the basin within the NPS's control to allow ample depth for the docking of their vessels.

The goal of the project is to address and design the repairs to exterior and interior Visitor Center building systems as well as infrastructure exposed to salt spray. The project includes new landscaping, installation of photovoltaic panels and measures to make the structure more resilient when future storm events occur.

Approximately 2000cy of sediment will be dredged from the NPS's controlled basin returning the depth to 8ft MLLW. The existing pier and bulkhead will be replaced including the fendering system and mooring hardware and a cathodic protection system will be installed on the existing sheet pile wall.

Attached please find a project Summary demonstrating the project's compliance with the U.S. Virgin Islands Coastal Zone Management Program, project drawings and an Environmental Assessment Report (EAR) detailing the project.

We look forward to your earliest decision on this matter.

Sincerely,

Nigel A. Fields  
Superintendent

cc: K. Randall, DSC PM

**NATIONAL PARK SERVICES  
COASTAL CONSISTENCY DETERMINATION  
REPAIR TO CRUZ BAY VISITOR CENTER, DOCKS, AND SURROUNDING GROUNDS  
IMPACTS BY HURRICANES IRMA AND MARIA  
ST. JOHN, US VIRGIN ISLANDS**

**INTRODUCTION**

The Virgin Islands National Park was impacted by Hurricanes Irma and Maria. Hurricanes Irma and Maria became the 12th and 13th named storms in the 2017 Atlantic hurricane season. These hurricanes struck on September 6th and September 18th respectively and were active through September 30th. Hurricane Irma reached category 5 intensity with maximum sustained winds of 220 mph. Hurricane Maria reached category 5 intensity and had maximum sustained winds of 175 miles per hour. As a result of these storms, hurricane force winds, storm surge, tornadoes and the displacement of inanimate objects caused damage to a number of NPS facilities across the Park including the Cruz Bay Visitor Center.

The purpose of this coastal consistency request is to permit the repairs to the Visitors Center building, the damaged aging waterfront infrastructure (existing bulkhead and pier), and the maintenance dredging of the existing basin.

Upland repairs are limited to existing structures and landscaped areas and will have no impact on native terrestrial species.

The basin has been dredged and bulkheaded for more than 50 years. The basin is affected by runoff from a large drainage which discharges into the southeast corner of the basin, large passenger vessels which access the adjacent bulkhead and dinghies and small vessels which scour the seafloor resuspending and distributing the shallow sediment in the eastern end of the basin. Due to the continual disturbance the basin, bulkhead and dock have limited colonization and no ESA listed coral species or critical habitat occurs within the basin. The maintenance dredging, and dock and bulkhead replacement will have a negligible impact on the marine environment. The project has the potential of impacting water quality during construction and a Water Quality Monitoring Plan will be implemented during construction.

The Coastal Zone Management Act of 1972 requires federal actions to be consistent to the maximum extent practicable with the enforceable policies of a coastal state's federally approved Coastal Management Plan. The repair to Cruz Bay Visitor Center, docks, and surrounding grounds as proposed will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the U.S. Virgin Islands Coastal Zone Management Program. This federal consistency determination demonstrates the projects compliance with the U.S. Virgin Islands Coastal Zone Management Program.

The following policies are set forth in the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).

**(1) protect, maintain, preserve and, where feasible, enhance and restore, the overall quality of the environment in the coastal zone, the natural and man-made resources therein, and the scenic and historic resources of the coastal zone for the benefit of residents of and visitors of the United States Virgin Islands;**

- *Project is designed repair and renovate NPS's Visitor Center and make it more resilient to future storm events. The project will restore the basin to a more usable depth and will provide better vessel access for residents and visitors alike.*
- *All construction activities will utilize best management practices to minimize disturbance and prevent shoreline erosion. A double set of proper length turbidity barriers (1ft. from seafloor) will be installed and maintained during all dredging and in-water work.*
- *A Water Quality Monitoring Plan which includes protective measures for sea turtles and marine mammals will be implemented during all in-water work including dredging, pile driving, pre-drilling, filling and all concrete work. Monitors will monitor effectiveness of the turbidity barriers and will require immediate action when turbidity barrier fail and or turbidity exceeds allowable limits, this includes requiring deployment of additional barriers, work stoppage, work slow downs or work being done at intervals to allow for the settling of sediment.*
- *The proposed project will not change the historic character or landscape of the National Park Service Site.*

*The project as designed protects, maintains, preserves and, where feasible, enhances and restores, the overall quality of the environment in the coastal zone, the natural and man-made resources therein, and the scenic and historic resources of the coastal zone for the benefit of residents of and visitors of the United States Virgin Islands and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).*

**(2) promote economic development and growth in the coastal zone and consider the need for development of greater than territorial concern by managing: (1) the impacts of human activity and (2) the use and development of renewable and nonrenewable resources so as to maintain and enhance the long-term productivity of the coastal environment;**

*This project involves the repair of an existing structures within the NPS Visitor Center Site and surrounding landscape. Therefore, this goal is not applicable to this project.*

**(3) assure priority for coastal-dependent development over other development in the coastal zone by reserving areas suitable for commercial uses including hotels and related facilities, industrial uses including port and marine facilities, and recreation uses;**

*This project involves the repair of an existing structures within the NPS Visitor Center Site and surrounding landscape. Therefore, this goal is not applicable to this project.*

**(4) assure the orderly, balanced utilization and conservation of the resources of the coastal zone, taking into account the social and economic needs of the residents of the United States**

**Virgin Islands;**

*This project involves the repair of an existing structures within the NPS Center Site and surrounding landscape. Therefore, this goal is not applicable to this project.*

**5) preserve, protect and maintain the trust lands and other submerged and filled lands of**

**the United States Virgin Islands so as to promote the general welfare of the people of the United States Virgin Islands;**

- *The purpose of the project is to repair and renovate the existing NPS Visitor Center to make it more resilient to future storm events and to restore the bulkhead around the basin, replace the damaged dock and restore the depth around the bulkhead dock to restore it to the intended use.*
- *NPS will continue their mission to protect and maintain cultural, natural and marine resources within the U.S. Virgin Islands.*
- *Marine resource management and research within the park coastal environment will be continue in partnership with the US Virgin Islands to ensure the preservation and protection of these resources.*

*The project as designed preserves, protects and maintains the trust lands and other submerged and filled lands of the United States Virgin Islands so as to promote the general welfare of the people of the United States Virgin Islands and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).*

**(6) preserve what has been a tradition and protect what has become a right of the public by insuring that the public, individually and collectively, has and shall continue to have the right to use and enjoy the shorelines and to maximize public access to and along the shorelines consistent with constitutionally-protected rights of private property owners;**

- *The area will have to be closed during construction for safety of the public. Once the project is finished the area will once again be open to the public and they will be allowed to walk and enjoy other recreational activities associated with the Visitor Center and its grounds.*
- *NPS Management Policies 2006 states that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks and that the NPS is committed to providing appropriate high-quality opportunities for visitors to enjoy the parks. Consequently, one of the park's goals is to ensure that visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of park facilities, services, and appropriate recreational opportunities. Specific context for assessing impacts of the alternatives on visitor use and experience includes: the ability of visitors to experience the St. John Visitor Center and learn about the area's resources and the availability and quality of visitor facilities and services at the St. John National Park.*

*The project as designed preserves what has been a tradition and protects what has become a right of the public by insuring that the public, individually and collectively, has and shall continue to have the right to use and enjoy the shorelines and to maximize public access to and along the shorelines and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).*

**(7) promote and provide affordable and diverse public recreational opportunities in the coastal zone for all residents of the United States Virgin Islands through acquisition, development and restoration of areas consistent with sound resource conservation principles;**

- *The existing facility was damaged by hurricanes Irma and Maria, due to damage and loss of depth in use of the facility has become limited. The dredging of the basin and the repair of the bulkhead and the replacement of the pier will provide better boat access to visitors and residents.*

- *The proposed project has incorporated control measures to protect water quality and minimize impact to those enjoying the Creek and greater Cruz Bay and its resources along the waterfront. The control measures will help ensure that upon completion of the project the water quality will return to pre-construction conditions. The Water Quality Monitoring Plan is attached herewith.*

- *The proposed project will be implementing monitoring for sea turtles and marine mammals to help protect these species from acoustic impacts and to make sure that these animals do not become entangled in turbidity barriers used to protect water quality.*

*The project as designed promote and provide affordable and diverse public recreational opportunities in the coastal zone for all residents of the United States Virgin Islands through the restoration of the area consistent with sound resource conservation principles and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).*

**(8) conserve ecologically significant resource areas for their contribution to marine productivity and value as wildlife habitats, and preserve the function and integrity of reefs, marine meadows, salt ponds, mangroves and other significant natural areas;**

- *The proposed project is within a highly disturbed basin with limited resources and will a negligible impact on the marine environment.*

- *Turbidity control and a water quality monitoring plan will be implemented to help protect the resources which surround the project area. Monitoring includes monitoring for sea turtles and marine mammals so that they are not impacted by acoustic impacts or do not become entangled in turbidity curtains or ropes.*

*The project as designed will not impact ecologically significant resource areas, and will implement measures to ensure that surrounding resources are not impacted and are protected for their contribution to marine productivity and value as wildlife habitats, and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).*

**(9) maintain or increase coastal water quality through control of erosion, sedimentation, runoff, siltation and sewage discharge;**

- *The project area is a revetted shoreline and as such is not subject to erosion. The bulkhead is damaged and its replacement will maintain the hardened shoreline.*

- *During construction there will be minimal earthwork. All areas of earth disturbance will be protected by silt fencing, any runoff resulting from areas of earth disturbance will be contained by the double turbidity barriers which will be placed around the project area.*

- *A double set of proper length turbidity barriers will be installed around all areas of in-water work including dredging, pile driving, concrete pouring, and de-watering. Water quality monitoring will be conducted throughout construction activities. Water quality will be continuously monitored to ensure that turbidity does not exceed levels that will be harmful to aquatic communities.*

- *The project will create no sewage discharge and will have no impact on existing sewage discharge.*

*The project as designed maintains coastal water quality through control of erosion, sedimentation, runoff, and siltation and therefore is consistent with this policy of the Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).*

The attached Environmental Assessment Report (EAR) has been prepared in accordance with the Coastal Zone Management guidelines. The EAR describes in detail the project, its construction methods, and methods which will be implemented to minimize impact on environment.

## ATTACHMENT - Scope of Work Summary

The Virgin Islands National Park was impacted by Hurricanes Irma and Maria. Hurricanes Irma and Maria became the 12th and 13th named storms in the 2017 Atlantic hurricane season. These hurricanes struck on September 6th and September 18th respectively and were active through September 30th. Hurricane Irma reached category 5 intensity with maximum sustained winds of 220 mph. Hurricane Maria reached category 5 intensity and had maximum sustained winds of 175 miles per hour. As a result of these storms, hurricane force winds, storm surge, tornadoes and the displacement of inanimate objects caused damage to a number of NPS facilities across the Park including the Cruz Bay Visitor Center.

This project includes the repairs to the Visitors Center building, the damaged aging waterfront infrastructure (existing bulkhead and pier), and the maintenance dredging of the existing basin. Upland repairs are limited to existing structures and landscaped areas and will have no impact on native terrestrial species. The landside work includes replacement of the existing roof, exterior facade cleaning/repainting, landscaping, pathway repairs, window and door replacement, shutter replacement, interior finish upgrades, light fixture replacement, HVAC system replacement, re-insulation of attic, installation of a photovoltaic solar power system, and installation of a new exterior equipment platform to raise outside HVAC equipment above flood level.

The basin has been dredged and bulkheaded for more than 50 years. The basin is affected by runoff from a large drainage which discharges into the southeast corner of the basin, large passenger vessels which access the adjacent bulkhead and dinghies and small vessels which scour the seafloor re-suspending and distributing the shallow sediment in the eastern end of the basin. Due to the continual disturbance the basin, bulkhead and dock have limited colonization and no ESA listed coral species or critical habitat occurs within the basin. The maintenance dredging, and dock and bulkhead replacement will have a negligible impact on the marine environment. The project has the potential of impacting water quality during construction and a Water Quality Monitoring Plan will be implemented during construction.

Pursuit of a Coastal Consistency Request and USACE NW #3 permits are in progress running parallel with this territorial permit waiver for the marine work. The territorial permit waiver requested is for the upland work associated with the building repairs and minor sitework.