



Gov.  
**JUAN F. LUIS HOSPITAL**  
& MEDICAL CENTER

August 10, 2021

via email to: [jp.oriol@dpmr.vi.gov](mailto:jp.oriol@dpmr.vi.gov)

The Honorable Jean-Pierre L. Oriol, Commissioner  
Department of Planning and Natural Resources  
Division of Coastal Zone Management  
St. Thomas, USVI 00801

RE: Request for a review for a Consistency Determination by the Coastal Zone Management Board under VI Code Section 1, VIR & Regs Title 12, Subchapter 904, section 904-8

Dear Commissioner Oriol:

The Governor Juan F. Luis Hospital and Medical Center (JFL) is in receipt of your letter dated July 12, 2021, wherein you advised that our application for the above-referenced Federal Consistency Determination was deemed incomplete. As such, the following supplements the subject application in providing the additional requested information.

**1. List of all federal and territorial permits.**

**JFL RESPONSE:** DPNR has confirmed receipt of this information as it was transmitted as a part of our June 23, 2021 application package.

**2. Detailed analysis that the project and its effects are consistent with the goals and policies of the VI Coastal Zone Management Program (VICZMP).**

**JFL RESPONSE: COASTAL CONSISTENCY**

The Governor Juan F. Luis Hospital and Medical Center (JFL) hereby requests your permission to undertake multiple FEMA funded projects that would support the stabilization of the only hospital system on the island of St. Croix, Virgin Islands through the construction of an interim hospital and support utility systems. These projects will be executed upon the current Governor Juan F. Luis Hospital and Medical Center campus located at 4007 Estate Diamond Ruby (*Parcel number 2-04600-0437-00*).

The hospital system was severely damaged during the 2017 Hurricane Irma and Hurricane Maria events. The hospital has been assessed and approved for replacement by FEMA and an interim facility is being constructed to provide a safe hospital environment pending the reconstruction of the new JFL.

JFL kindly seeks your review and approval for the required Consistency Determination certification process in accordance with the CZM as required under the VI Code Section 1, VIR



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& Regs Title 12, Subchapter 904, section 904-8. The various projects may include the construction, demolition, earth change, soil boring, electrical, plumbing, mechanical piping trenching, and generator installations on various sites of the JFL campus.

The Coastal Zone Management Act of 1972 requires that federal actions, within and outside the coastal zone, which have reasonably foreseeable effects on any coastal use (land or water), or natural resource of the coastal zone be consistent with the enforceable policies of a state's federally approved coastal management program. The JFL Interim Hospital and Support Utility Systems Project, as proposed, will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the U.S. Virgin Islands' CZM Program. This federal consistency determination demonstrates the JFL Interim Hospital project's compliance with the U.S. Virgin Islands' CZM Program.

The following policies are set forth in the U.S. Virgin Islands Code Title 12, Conservation Chapter 21, Virgin Islands Coastal Zone Management [V.I. Code tit. 12, § 903(b)]. The proposed JFL Interim Hospital project meets each of the basic goals of the USVI for its coastal zone as follows:

**USVI 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.**

- The proposed JFL Interim Hospital project is designed to be within existing previously disturbed areas. The project will not impact any natural resources. Best Management Practices (BMPs) will be implemented throughout the execution of the project to mitigate stormwater run-off.

**(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 proposed project promotes the economic development and growth in the coastal zone by stabilizing the only hospital system on the island of St. Croix, Virgin Islands. Further, it will provide for the reliable and efficient delivery of hospital healthcare services on the island of St. Croix, which are critically needed.

**(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 use.**

- The project supports the stabilization of the only hospital system on the island of St. Croix, Virgin Islands through the construction of an interim hospital and support



utility systems and is therefore consistent with this policy.

**(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.**

- The project will include construction, demolition, earth change, soil boring, electrical, plumbing, mechanical piping trenching, and generator installations on various sites of the JFL campus that have been previously altered and will improve the delivery of healthcare on St. Croix. The JFL Hospital is the only hospital on the island of St. Croix. The JFL Interim Hospital Project is critical to meeting the economic and social needs of residents of the island of St. Croix.

**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 proposed project will not impact trust lands or other submerged or filled lands of the U.S. Virgin Islands.

**(6) Preserve what has been a tradition and protect what has become a right of the public by ensuring 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 proposed project will in no way affect public access to, or use of, the shoreline. The project is located well inland.

**(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 proposed project will not affect public recreational opportunities in the coastal zone.

**(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 designed so that it impacts only previously disturbed areas. The project will have no impact on natural resources and will utilize BMPs to minimize areas of disturbance, thereby protecting adjacent habitats.

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



The proposed project will have no long-term change on sedimentation or erosion and will not result in the creation of uncontrolled wastewater. As necessary, the project will implement sedimentation and erosion control BMPs to prevent loss of sediment from the project site.

**3. An assessment relating to the probable effects of the proposed activity and its associated facilities on the VICZMP.**

**JFL RESPONSE:** The proposed JFL Interim Hospital Project as designed, will maintain coastal water quality through control of erosion, sedimentation, runoff, and siltation and therefore is consistent with the policy set forth in the USVI Code Title 12, Conservation Chapter 21, Virgin Islands Coastal Zone Management [V.I. Code tit. 12, § 903 (b)].

The proposed JFL Interim Hospital Project, as designed, protects, maintains, preserves, and enhances 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 USVI. It is therefore consistent with the V.I. Coastal Zone Management Program Policy.

Thank you for your careful consideration of this request for a Consistency Determination.

Best regards,

Dyma Williams, RN, BSN, MJ, CPHRM  
Interim Chief Executive Officer