Federal Consistency Determination Submittal: Renovation and repairs to the exterior of the structure on the Government of the U.S. Virgin Islands, Department of Health Frederiksted WIC Building, 22 B Strand Street Frederiksted, St. Croix, VI

For United States Virgin Islands Department Of Planning And Natural Resources Minor Land Development Application

May 17, 2022

Prepared for:

Government of the Virgin Islands of the United States,
Department of Planning and Natural Resources,
Division of Coastal Management

On behalf of Department of Health, Honorable Commissioner Justa Encarnacion

Prepared by:

Springline Architects
6346 Estate Smith Bay
St. Thomas, U.S.V.I. 00802

P: (340) 777-2345
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1.0 Location of Project

St. Croix Location Map
Fredericksted Vicinity Map

SITE
2.0 Abstract:

Project Scope of Work Summary

The proposed exterior and interior building renovation project is located on the western side of the island of St. Croix. The proposed project scope of work consists of repair and in some cases replacement of the shutters, windows, doors, roof repairs of a portion of a historic structure in Frederiksted, St. Croix. There is a new drainage system implemented on the interior courtyard of the building.

The renovations do not add or subtract to the existing building footprint and the existing drainage system is improved. The portion of the building in the scope of work has an approximate 1,967 square foot footprint. The completed facility will include WIC clinic, executive offices, a classroom, kitchen, water closets, and storage.

3.0 Objectives of the proposed project

Environmental Impacts

Since 2017 the Frederiksted WIC Building has been damaged as a result of high winds and wind-driven rain from two category 5 hurricanes, Irma and Maria. The goal of this rehabilitation project is to repair and renovate in order to help the DOH return to full operations in this facility.

Climate/Weather

The site, during and after the proposed renovation and drainage improvements of the existing building will have minimal affect from climate or weather. During exterior drainage renovations, rainfall will influence the open areas created. Sedimentation and erosion controls will be implemented to ensure rainfall will not impact the nearby drainage way during construction. The new slot drain system will have the same, if not a reduced, environmental impact. The contractor will clean out and verify conditions of underground piping. The contractor will verify that drain pipe connects to storm drain and not building cistern. New pipe drain will connect to existing roof drainage system.

Landform Geology, Soils and Historic Land Use

The proposed building renovations will be in areas that have already been disturbed. The renovations and site work will use the same footprint as is currently disturbed.

Drainage, Erosion Control, and Maintenance

The proposed project will have minimal impact on the drainage, flooding, and erosion of the building. After re-work of the drainage system the drainage and erosion control will be enhanced from the existing conditions.

Drainage Patterns
The proposed project will have no additional impact on existing building drainage patterns once the overall drainage re-work is completed.

**Coastal Floodplain**

Sediment and erosion controls will be implemented in this area and any materials that need to be stockpiled overnight will be properly stored so as not to be susceptible to runoff.

**Fresh Water Resources**

The proposed drainage re-work of the buildings will have no impact on freshwater resources. No freshwater ponds or streams occur within the project footprint.

**Oceanography**

The Virgin Islands coastal areas are not subject to significant tidal ranges or tidal currents. The sea flows around the island causing an average tidal height of only a few inches and maximum change of only a little over a foot. The deep-water waves off of St. Croix are primarily driven by the northeast trade winds that blow most of the year. Southeasterly swell with waves one to twelve feet high become significant in late summer and fall when the trade winds blow from the east or when tropical storms and hurricanes pass the islands at a distance to the south. During the winter months, long length, long period northern swells develop to a height of 1 to 5 feet. The proposed project occurs near the shoreline however will be minimally affected by wave action.

**Marine Resources**

The proposed project occurs near the shoreline, however, it is inland and will have no direct impact on the marine environment.

**Terrestrial Resources**

The proposed project will occur within previously developed areas. No natural terrestrial resources or any native flora or fauna will be impacted during the demolition of the existing buildings.

**Wetlands**

The project will have no impact on wetlands, as there are no wetlands in, or adjacent to, the proposed project site.

**Rare and Endangered Species**

No endangered or threatened species or endangered species habitat exists within proposed project site.

**Air Quality**

There will be extremely minor increases in emissions during the construction phase of the building due to the use of construction equipment that will create combustion engine exhaust. Upon project completion, air quality will return to pre-construction conditions.
IMPACT ON MAN’S ENVIRONMENT

Land and Water Use Plans

The project site is zoned Public (P) which complies with the current Coastal Land and Water Use Plan. After the renovations and drainage re-work of the building, the site will have the same size and footprint with enhanced drainage. As a result, this project will have a positive impact on the existing site conditions as to not add density to the built environment.

Historical and Archaeological Resources

The proposed project only involves areas that have already been developed and will have no impact on any known historical or archaeological resources. The historic nature of the building will be protected and preserved.

Waste Disposal and Accidental Spills

The Virgin Islands Waste Management Authority has specific guidelines and criteria for accepting construction debris. Demolition waste will be disposed of in accordance with all governing laws and regulations. The construction equipment will be kept in good operating condition during the proposed project timeline and its refueling on site will be kept to a minimum.

COASTAL CONSISTENCY

The building renovation and drainage of the Frederiksted WIC project consists of a total footprint area of approximately 1,967 square feet. The renovation and drainage of the building has a negligible potential of impacting environmental resources, or ambient water quality during construction. As necessary, sedimentation and erosion control measures will be implemented during construction to ensure that no environmental impacts occur. The proposed project occurs only within previously disturbed areas and excavation of historical or cultural resources is not anticipated. Project activities will stop if historic remains or resources are encountered, and SHPO will be contacted to determine the best course of action.

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 proposed building demolition project 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 (CZM) Program. This federal consistency determination demonstrates the building demolition 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 building demolition and rebuild project meets each of the basic goals of the USVI for its coastal zone. Additional details are 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 USVI. –

The project will impact only previously disturbed areas of building footprint and adjacent drainage. This project is located outside the coastal area and is therefore consistent with this policy.

(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. –

The proposed renovation and drainage project will only have a positive impact on the economic development and growth in the coastal zone to put a needed Dept. of Health building into re-use.

(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, 15 industrial uses including port and marine facilities, and recreation uses. –

The building and site consist of the same size and footprint. This project is located outside the coastal area 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 USVI. –

The project will impact only previously disturbed areas and building footprint; it will enhance the social and economic needs of the USVI residents for the area.

(5) Preserve, protect, and maintain the trust lands and other submerged and filled lands of the USVI so as to promote the general welfare of the people of the USVI. –

The project will impact only previously disturbed areas and building footprint; it will enhance the social, economic, and general welfare needs of the USVI residents for the area.

(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 building and site consist of the same size and footprint. This project is located outside the coastal area and is therefore consistent with this policy.

(7) Promote and provide affordable and diverse public recreational opportunities in the coastal zone for all residents of the USVI through acquisition, development, and restoration of areas consistent with sound resource conservation principles. –

The project will not affect public recreational opportunities in the coastal zone.
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 building and site consist of the same size and footprint. This project is located outside the coastal area and is therefore consistent with this policy. The project will have no impact on natural resources and will utilize best management practices (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 project will have minimal long-term change on sedimentation or erosion and will not result in the creation of wastewater. Drainage from the building will be improved with less water stagnation on site currently.

4.0 Description of Project

The building will be used by the Department of Health as part of the WIC (Women, Infants and Children) Program. The existing building was damaged by Hurricanes Irma and Maria and was deemed a renovation project with an improvement to its site drainage. The existing building is historic and would remain with existing shutters, windows and doors being appropriately repaired or replaced with like-kind. The renovations and drainage improvements all fit within the existing footprint and to serve the specific needs of the WIC program. The project and drainage improvements fit within the previous footprint and is approximately 1,967 square feet.

4.1 SUMMARY OF PROPOSED ACTIVITY

- Install Erosion control materials, including silt fence as needed.
- Clean and paint Shutters as needed
- Replace Shutters as needed
- Scrape, repaint and replace hardware as needed
- Windows: reglaze scrape, caulk, and repaint
- Doors: scrape, repaint
- Build out interiors per documents
- Remove and replace gutters
- Remove and replace gable end flashing
- Site Drainage: slot drain system, clean out verify all underground piping/drainage systems
- Pressure wash and paint courtyard hardscape
- Remove silt fencing
- Install finishes and furniture and start utilizing building.
4.1.1 Purpose of Project
The proposed project scope of work consists of repair and in some cases replacement of the shutters, windows, doors, roof repairs of a portion of a historic structure in Frederiksted, St. Croix. There is a new drainage system implemented on the interior courtyard of the building.

4.1.2 Presence and Location of Critical Areas
The building and site work will utilize the existing footprint, and no critical areas are present.

4.1.3 Method of Construction
Repair and replace with like-kind materials.

4.1.4 Provisions to Limit Site Disturbance
The site is previously disturbed, and the proposed construction will be within the limits of the previously disturbed areas.

4.1.5 Erosion and Sediment Control Devices
Silt fences will be installed around the proposed disturbed area.

4.1.6 Schedule for Earth Change and Implementation of Erosion and Sediment Control Measures
Silt fences will be installed prior to excavation of existing drainage systems. Once silt fences are in place, excavation will commence.

4.1.7 Maintenance of Erosion and Sediment Control Measures
Contractor will be required to inspect silt fences on a daily basis as part of the construction reports. These will be reviewed on a weekly basis report and then submitted as part of the monthly construction report submitted to the Owner.

4.1.8 Stormwater Management
The project will tie into the existing stormwater site drainage. Contractor will clean out and verify conditions of underground piping and connections to storm drain.

4.1.9 Maintenance of Stormwater Management
The stormwater connections will be reviewed on a monthly basis.

4.1.10 Method of Wastewater Collection and Disposal
The project will tie into the existing Wastewater system in place.

4.2 Implementation Plans: See 5.0 Figures
5.0 Figures

Fig. 1 Existing Structure
Fig. 2 Site Survey
Fig. 3 Roof Plan
Fig. 4 Sitework Plan
Fig. 5 Lower Floor Plan
Fig. 6 Elevations