May 2, 2022

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: Virgin Islands Department of Health (VIDOH) Request for Coastal Consistency Determination for the Demolition and Reconstruction of the Charles Harwood Memorial Complex
FEMA Grants Manager (GM) #70645
FEMA Project Worksheet (PW) #647

Dear Commissioner Oriol:

On behalf of Justa Encarnacion, Commissioner of the Virgin Islands Department of Health (VIDOH), Flad Architects respectfully requests a decision of Coastal Consistency for the Charles Harwood Memorial Complex Demolition and Reconstruction project. The VIDOH is proposing complete demolition of the main building, annex building, and other permanent structures on the site, followed by the construction of the replacement building.

The Charles Harwood Memorial Complex (CHMC) is located at 3500 Estate Richmond in Christiansted, St. Croix, 00820. The CHMC facilities suffered extensive damage from Hurricanes Irma and Maria in 2017, compromising the Department of Health’s operations and ability to serve its clients on the island of St. Croix and across the territory. In turn, CHMC was assessed and approved as a prudent replacement by FEMA and the current complex will be demolished and replaced under a FEMA Public Assistance Grant (Grants Manager #70645).

The replacement building will be a state-of-the-art public health facility that enables everyone to achieve optimal health. It will provide clinical, regulatory, and administrative services and resources to support the public health needs of the territory in a centralized, accessible hub for the community. The new facility will promote health and wellness and house a range of clinical services such as Community Health, Behavioral health, and Family Planning, as well as other public health services including Environmental Health, Epidemiology, and Vital Statistics. The new facility will ultimately support the Department of Health in their mission of increasing access to health and wellness services for those who are underserved or otherwise experience barriers to obtaining healthcare.

Preliminary information about the project was reviewed during the CZM Pre-application Meeting held on December 3rd, 2021. The demolition scope includes a full clearing of the structures on the site, including demolition of the 3-story main building, 1-story annex building, and five outer buildings, and relocation of other temporary structures on the site such as the Modular Lab. The proposed demolition project will impact only previously disturbed areas associated with the removal of the existing Charles Harwood Memorial Complex buildings, including the existing foundations. Lead and asbestos were found in some of the existing structures; therefore, abatement will be required prior to demolition. Demolition for the project will begin as soon as all approvals have been finalized and abatement has been completed. The Department of Health has completed 30% design for the replacement building, which is anticipated to be approximately
200,000 square feet. The 30% design information is included with this submission in compliance with the requirements for federal consistency review for construction of the new facility.

The proposed Charles Harwood Memorial Complex demolition and reconstruction project is essential for restoring comprehensive public health services for St. Croix and the broader territory. The new facility will provide a safe and reliable building that will promote the health of the DOH clients and patients, team, and broader community. It will be a facility that the community relies on during moments of vulnerability, and the structure itself will demonstrate strength and resilience for generations to come.

Attached please find a project summary and additional materials demonstrating the project’s progression and compliance with the U.S. Virgin Islands Coastal Zone Management Program. Thank you for your consideration of this request and please contact VIDOH Deputy Commissioner Reuben Molloy or myself with any questions or if additional information is required.

Sincerely,

Steven Jackson, LEED AP
Principal-in-Charge
Flad Architects

**Attachment(s):**

1. Charles Harwood Memorial Complex Project Summary
2. Abatement and Demolition Package
3. Replacement Facility Design (30%)
4. Preliminary Hydrology Study
5. Erosion Control Plans
6. Site Location Plan

**cc:** Ms. Anita E. Nibbs, DPNR – Environmental Planner III
Mr. Marlon Hibbert, DPNR – Director of the Coastal Zone Management Division
Ms. Justa Encarnacion, VIDOH – Commissioner of Health
Dr. Nicole Syms, VIDOH – Assistant Commissioner
Mr. Reuben Molloy, VIDOH – Deputy Commissioner
Ms. Tawana Nicholas, VIDPW – Chief Engineer
Mr. Gerville Larsen, Taller Larjas – Principal / Owner
Ms. Betty Quintana, Flad Architects – Project Architect
Ms. Lauren Fiedler, Flad Architects – Project Manager