FEDERAL CONSISTENCY DETERMINATION REQUEST

ANNA’S HOPE ADMINISTRATION BUILDING
8 & Matr 36-A Anna’s Hope, St. Croix,
U.S. Virgin Islands

USVI DEPARTMENT OF HUMAN SERVICES
HEAD START & EARLY HEAD START PROGRAM
ST. CROIX, US VIRGIN ISLANDS

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INTRODUCTION

The US Virgin Islands Department of Human Services is proposing the reconstruction of Anna’s Hope administration building. The existing building of approximately 7,470 square feet will be demolished and a new 7,680 square feet constructed in the same footprint. The property is located at 8 & Matr 36-A, Anna’s Hope, St. Croix, U.S. Virgin Islands. The existing structure was severely damaged by Hurricane Maria on September 20, 2017. The storm produced strong destructive winds, power outages, down power lines, structure and property damage and fallen trees.

The existing buildings were originally constructed prior major hurricane damage in the late 80’s from Hurricane Hugo to more recently, Hurricane Maria in 2017. Since the time of Hurricane Hugo in 1989, the Virgin Islands has adopted, first the Uniform Building Code for structures, and more recently, the International Building Code. Besides the existing poor condition of the buildings on site. Caused by damages from past hurricanes, their old construction cannot meet the structural requirements of the 2018 International Building Code. Furthermore, the existing structure cannot accommodate the program requirements for a functional facility.

PROJECT LOCATION

The project is located within a bigger property owned by the Government of the US Virgin Islands as shown in figure 1. The property is zoned P.

Figure 1: Property vs. As built lines
The as-built property line comprises the currently fenced area within the main property. The Anna’s Hope Administration Building project will be developed within a specific area of the fenced as-built property line as shown in figure 2.

While the fenced area is approximately 2.27 acres, the project area will be approximately 0.82 acres. Property ID# is 206800010100.

The property is limited: to the North and East by Queen Mary Hwy and a local road that give access to the project area; to the South remnants of Matr 36A & 8; and to the West by other government facilities within the same main track of land. Project GPS coordinates are: latitude 17.727400 / longitude -64.727600.
SITE DESCRIPTION

GENERAL

The site is completely developed and occupied by one single story building (40 feet 3 inches wide by 175 feet 8 inches long), a generator area, a water tank and a parking area with 34 parking spaces including 4 handicap spots. This building is constructed of 8” concrete masonry unit (CMU) walls with metal roofs.

Figure 3: Existing Conditions Survey of Site

Photo 1: Front View
Photo 2: View from street

Photo 3: Rear View
ENVIRONMENTAL IMPACTS

TOPOGRAPHY AND DRAINAGE PATTERNS

The existing ground surface elevations on the property varies from about 138 meters MSL in the south-western corner of the property to about 147 meters in the north-eastern corner. Roughly, the property drains topographically from north east to south west and discharge into adjacent property through sheet flow condition. In the area there is no public storm sewer system available.

SOILS

According to the USDA online Soil Survey, soils within the project area are classified as Sion clay, 2 to 5 percent slopes (SiB). The Sion series consists of very deep, well drained, moderately slowly permeable soils on side slopes and valley floors. They formed in alkaline marine deposits.

According to the USDA – Natural Resources Conservation Service, while these soils are not considered as hydric, it might include Aquents (AqA) inclusions when found in depressions.

![Figure 4: USDA Soil Survey Map](image)

FLOOD ZONES AND EROSION CONTROL

According to Panel 0082 of the US Virgin Islands Advisory Base Flood Elevation Maps, the project area is not within any flood area. Finished floor elevation for the proposed building will be 143 feet.
COASTAL FLOODPLAIN, OCEANOGRAPHY AND MARINE RESOURCES

The project is located approximately 3.5 miles (18,480 feet) inland away from the southern and approximately 5 miles (26,400 feet) inland away from the northern coastal waters of St. Croix. No impacts are anticipated to the marine environment or from sea storm events.

COASTAL BARRIERS

According to the USFWS IPaC (Information for Planning and Consultation) webtool, there are no coastal barriers at this location

FRESH WATER RESOURCES

The closest freshwater resource is an unnamed creek approximately 340 meters (1,116 feet) to the South of the property.

TERRESTRIAL RESOURCES

The project area comprises a complete developed track of land with no vegetation.

WETLANDS

According to the National Wetlands Inventory Maps, published by the US Fish and Wildlife Service, the project area is not affected by Wetlands.
RARE AND ENDANGERED SPECIES

According to IPaC there are no endangered species, natural wildlife refuge lands or fish hatcheries at this location. There are no migratory birds of special concern expected to occur at this location.

AIR QUALITY

All of the U.S. Virgin Islands is designated Class II by the Environmental Protection Agency, in compliance with National Ambient Air Quality Standards. In Class II air quality regions, the following air pollutants are regulated: open burning, visible air contaminants, particulate matter emissions, volatile petroleum products, sulfur compounds, and internal combustion engine exhaust (Virgin Islands Code Rules and Regulations).

It is expected that excavation equipment will be used during project construction and will create combustion engine exhaust during on site use. Air quality will return to pre-construction conditions upon the completion of the construction process.

An emergency stand-by generator that meets EPA clean air standards is proposed for this project. All permit applications will be filled for this equipment at the appropriate time prior to installation.

PROPOSED PROJECT DESCRIPTION

The proposed project comprises the demolition of the existing facilities and the construction of one building of approximately 7,582 square feet. The new building will be within the footprint of the existing building. The site will have a main parking located to the south of the building where the existing parking is currently located. There are going to be 27 regular parking spots and 4 handicap spots for a total of 31 parking spaces. The site plan also provides with an area for trash deposit, and
an area for the cistern tank and a 135kw electric generator. Project proposed to re-use exiting septic tank, no increase in bathrooms unit are proposed. Existing septic tank will require inspection and maintenance for its use for the new facility.

The new facility’s structure is designed to be resistant as required by updated design criteria for hurricanes and other seismic activity. The structure will consist of poured concrete walls and roofs. The entire project is designed to resist up to 180 mph wind forces per current code requirements which is equivalent to a Category 5 hurricane and higher.

Figure 7: Proposed Master Site Plan
IMPACT ON MAN’S ENVIRONMENT

VISUAL IMPACTS

The proposed Head Start Facility will be a visual improvement over the existing severely damaged and abandoned facility it is replacing.

The proposed Head Start Facility will be a visual improvement over the existing severely damaged and abandoned facility it is replacing. The new design considered the V.I. Architecture and includes sloped concrete roofs and walls, impact resistant windows and doors for resisting hurricane and seismic forces. The buildings will be insulated per the new building code standards at the roof and walls. The metal roofs will provide long lasting weather protection. The high efficiency plumbing, HVAC and light fixtures will provide savings in water and electricity consumption. The interior finishes will include recycled and low VOC materials. Thus, the buildings will be less burden to environment meanwhile providing better setting for its occupants.

Figure 8: Aerial View Rendering
LAND AND WATER USE PLANS

The project parcel is zoned Public (P) which complies with current Coastal Land and Water Use Plan and meets all use requirements for the zoning district as set forth in Title 29 of the Virgin Islands Code.

HISTORICAL AND ARCHAEOLOGICAL RESOURCES

The proposed project comprises a completely developed track of land with no known archaeological relevance. The property is not within any declared historical zones. There is also no documentation in regards to historical ruins found at or near the site. Standard procedures will be used if any items of Archaeological relevance are observed during the excavation activities on the site.

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. Any excess excavated material will be collected, taken off-site and properly disposed of.

An assessment was conducted by GEC Corp. and all Asbestos and Lead testing results will be submitted to DPNR.
An abatement plan will be submitted to the Virgin Islands Waste Management Authority (VIWMA) prior to the commencement of demolition work.

The handling and disposal of any hazardous materials, such as the used oil from the motor pool area, and the fuel from existing generator fuel storage will be done in strict accordance with all governing laws and regulations. The equipment will be kept in good operational condition during the proposed project timeline and refueling on site will be kept to a minimum.

**EROSION AND SEDIMENTATION CONTROL PLANS**

Sedimentation and erosion controls will be implemented to ensure rainfall will not impact the adjacent properties and streets during construction. This will include silt fencing, gravel entrances, at the entry gate, and check dams.

**GRADING AND STORMWATER MANAGEMENT**

Proposed site will be improved by means of earthwork, that includes deposit of fill material and grading activities. Pre and post drainage condition will be evaluated and an internal storm sewer system will be designed. Internal drainage system will be connected to an open detention area which will be included as part of final design. Preliminarily, this open detention area will be located, along the western boundary green area. stabilized with rock with an outfall that will allow storm water sheet flow into the lowest point of the site. In the project area there is no public storm sewer system available to connect the project.

To reduce site runoff due to reduction in pervious areas, an open retention pond is proposed to manage the increase with a proposed open retention pond.

Storm water runoff from the road, will be manage as part of the site storm sewer system design proving conveyance to allow for sheet flow, following the existing drainage path and discharge point to adjacent property.

Existing road elevation varies from 140 feet to 145 feet in elevation, site is at a lower elevation with existing Finish Floor Elevation (FFE) of 143 feet in elevation. Proposed grading plan considers for the buildings FFE is 143 feet in elevation.
UTILITIES

ELECTRIC POWER

The project site has a high voltage connection to WAPA system. Also, existing site has an electric emergency generator that is not in service. The project required electrical load has been determined in 125 kva. An electrical emergency generator with a capacity of 135 kw is also being proposed.

A consultation with Virgin Islands Water and Power Authority (WAPA) will be conducted, to determine requirements to connect the project to existing electrical system.

WATER

The project site has a 1/2-inch diameter SCH 40 PVC water connection to WAPA system. A connection to exiting WAPA potable water system, reusing the existing 1/2- inch water meter is being proposed. A consultation with Virgin Islands Water and Power Authority (WAPA) will be conducted, to determine requirements to connect the project to existing potable water system.

A potable water cistern with a capacity of two thousand four hundred (2,400) gallons with a pumping and filtering system is also proposed to supply the water demand to the various structures for emergency needs.

As an additional measure reuse of existing water cistern is considered, for 50% of roof runoff water harvesting.

WASTE WATER - SEWAGE

The site has no connection to a WAPA sewer system and is currently served by a septic tank. The project proposes to keep using the existing septic tank. This septic tank will be inspected and cleaned before it is connected to the new project. The sewer demand is estimated in 1,920 gpd.
The proposed project consists on two main phases: Demolition of the existing structures and facilities and construction of the new administration building facilities. The project site is approximately 3.5 miles (18,480 feet) to approximately 5 miles (26,400 feet) inland from coastal waters.

It is expected that both, the demolition of the existing building and the new construction might have the potential of impacting environmental resources, air and water quality during both demolition and construction activities. Preventive and mitigation measures, such as sedimentation and erosion control plans, will be implemented to minimize the risks for these potential environmental impacts to 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 resources of the Coastal Zone be consistent with the enforceable policies of a state's federally approved Coastal Management Program. The proposed facility at 8 & Matr 36-A, Anna’s Hope, St. Croix, U.S. Virgin Islands is designed to fall within existing roadways and previously disturbed areas. The project will not impact any natural resources and will improve the visual landscape in the Anna’s Hope area. As proposed, it will be undertaken in a manner consistent with the enforceable policies of the U.S. Virgin Islands’ CZM Program. This Federal Consistency Determination demonstrates the proposed project’s compliance with the U.S. Virgin Islands’ CZM Program.

The project meets each of the basic goals of the USVI for its coastal zone as set forth in the Virgin Islands Code Title 12, Conservation Chapter 21, Virgin Islands Coastal Zone Management [V.I. Code tit. 12, § 903(b)]. 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 United States Virgin Islands.

The proposed facility at 8 & Matr 36-A, Anna’s Hope, St. Croix, U.S. Virgin Islands is designed to be within existing roadways and previously disturbed areas. The project will not impact any natural resources and will improve the visual landscape in the area. The new design considered the V.I. Architecture such as sloped roofs and walls, impact resistant windows and doors for resisting hurricane and seismic forces. The new buildings will be less burden to environment meanwhile providing better setting for its occupants.
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 project promotes the economic development and growth in the area by providing an improved administration building that will appropriately serve current administrative requirement of the Head Start program in the Island, thus providing a better service to the community. The development will be within a previously developed parcel avoiding new impacts on undeveloped areas.

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.**

The proposed project does not impact coastal dependent development within the coastal zone area. It is located 3.5 miles (18,480 feet) to approximately 5 miles (26,400 feet) inland from coastal waters.

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 proposed Head Start Facility at 8 & Matr 36-A, Anna’s Hope, St. Croix, U.S. Virgin Islands is designed to be within existing roadways and previously disturbed areas. The project will not impact any natural resources and will improve the visual landscape in the Anna’s Hope area. The proposed project will provide necessary public services and therefore will meet the economic and social needs of the residents of the area and the community of St. Croix on a whole.

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. The project will serve a public need by providing an adequate administrative space for the Head Start program of the Island.

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 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 proposed project will have no long-term change on sedimentation or erosion.

The proposed Head Start Facility at 8 & Matr 36-A, Anna’s Hope, St. Croix, U.S. Virgin Islands is designed to be within existing roadways and previously disturbed areas. The project will not impact any natural resources and will improve the visual landscape in the Upper Bethlehem area. It will maintain coastal water quality through control of erosion, sedimentation, runoff, and siltation. As designed, it protects, maintains, preserves, and enhances the overall quality of the environment in the 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 policy set forth in the Virgin Islands Code Title 12, Conservation Chapter 21, Virgin Islands Coastal Zone Management [V.I. Code tit. 12, § 903 (b)].

END COASTAL CONSISTENCY DETERMINATION REQUEST