

VISHPO CONCURRENCE: Virgin Islands Department of Education, St. Croix
Property Location: Arthur A. Richards Junior High School 20-21 Stoney Ground, Plot # 20 Frederiksted (GPS: 17.69367, -64.88086); Evelyn Williams Elementary School, 13A Mount Pleasant, Frederiksted (GPS: 17.708518, -64.814406)
Undertaking: Demolition of Arthur A. Richards Junior High School, and Evelyn Williams Elementary School for reconstruction at Evelyn Williams Site
FEMA Project: PW-4340-1052-USVI / GM# 86891 (PA)
FEMA's Determination of Effect: No Historic Properties Affected pursuant to 36 CFR 800.4(d)(1).

Date: March 23, 2021 **VI SHPO Section 106 Number:**

As proposed, VISHPO X concurs ___ does not concur with FEMA's determination of effect. If no consulting parties object to this finding within the 15-day review period (per Stipulation I.D.2.b. of USVI Programmatic Agreement), the project may proceed as proposed unless resources are discovered during project implementation, pursuant to 36 CFR 800.13.



Sean L. Krigger
Director/Deputy State Historic Preservation Officer
Department of Planning and Natural Resources
Virgin Islands State Historic Preservation Office



FEMA

March 19, 2021

Sean L. Krigger
Director/Deputy State Historic Preservation Officer
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Virgin Islands State Historic Preservation Office
5064 Forts Straede 1, Kongens Quarter
Charlotte Amalie, Virgin Islands 00802

Subject: Section 106 Consultation
Project Number: PW-4340-1052-USVI / GM# 86891 (PA)
Sub-recipient: Virgin Islands Department of Education/St. Croix
Undertaking: Demolition of Arthur A. Richards Junior High School (GPS: 17.69367, -64.88086) and Evelyn Williams Elementary School (GPS: 17.708518, -64.814406) for reconstruction at Evelyn Williams Site

Dear Mr. Krigger,

The Federal Emergency Management Agency (FEMA) will be providing funds authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, in response to major Disaster Declaration FEMA-4340-DR-USVI, dated September 20, 2017. FEMA is conducting Section 106 Consultation for the above-referenced project in accordance with 36 CFR Part 800 and Stipulation II.D. Standard Project Review of FEMA's Virgin Islands Programmatic Agreement executed on July 14, 2016.

Undertaking

The proposed Undertaking is demolition of the Arthur A. Richards Junior High School complex (6 buildings) at 20-21 Stoney Ground, Plot # 20 Frederiksted (Arthur Richards), and Evelyn Williams Elementary School complex (13 buildings) at 13A Mount Pleasant, Frederiksted (Evelyn Williams). A consolidated school complex will be reconstructed at the Evelyn Williams site, site plans of which have yet to be developed. Both school complexes were structurally damaged from the hurricanes and evaluated and approved for prudent replacement.

Demolition of the six (6) buildings at Arthur Richards will include the demolition of footings and foundations and re-grading and re-planting of all disturbed areas to original condition. The cisterns will not be disturbed, and the location of utility services to the school will be identified, stubbed-off, and disconnected; continuity of service will remain to the temporary (sprung-unit) school facilities located to the south. Maximum depth of ground disturbance is anticipated to be

no more than 3-feet. The debris staging area will be located at GPS: 17.69420, -64.88000 (Figure1).

Demolition of the thirteen (13) buildings at Evelyn Williams will include the demolition of footings and foundations; the parking lot will be left as-is and the site will be re-graded. The cisterns will not be disturbed, and the location of utility services to the school will be identified, stubbed-off, and disconnected. Maximum depth of ground disturbance is anticipated to be no more than 3-feet. The debris staging area will be located at GPS: 17.70840, -64.813792 (Figure 5).

The items in the scope of work identified below are either in-kind replacement or repairs that meet existing Tier II Allowances described in Appendix B of the Programmatic Agreement executed July 14, 2016 and include:

- Demolition of building less than 45 years of age (Arthur A. Richards Junior High School complex): B.11.a.

The following scope of work item is not covered by existing Programmatic Allowances and is the subject of this consultation:

- Demolition of a structure over 45 years of age (Evelyn Williams Elementary School complex).

Area of Potential Effects (APE)

Pursuant to 36 CFR 800.4(a)(1), the Area of Potential Effects (APE) is defined as the geographic area(s) within which the undertaking may directly or indirectly affect historic resources. Based on the proposed scope of work, FEMA has determined that the APEs for this undertaking includes the tax parcels on which the Arthur Richards Junior High School complex is located (Figure 2), and the tax parcel on which the Evelyn Williams Elementary School complex is located (Figure 6).

Identification and Evaluation

Architecture

Arthur A. Richards Junior High School

Constructed in c. 1977, Arthur A. Richards Junior High School is located just south of the intersection of Centerline Road and Route 70 in Frederiksted. This Modern Style school complex consists of six individual buildings of reinforced concrete with CMU infills topped with a corrugated metal roof over structural steel roof framing and interconnected by flat-roofed covered breezeways (Figure 1 and Photo 1). Each individual building has a compound hip roof system with an interior courtyard; windows were aluminum-framed fixed windows, some with awning windows in the lower portion, and ventilation louvers run around the building perimeter. Architectural decorative features include breeze block walls, and a wide smooth cornice. A modular building used for the steel band was added at a later date (Photos 2-6).

The school complex is located in a residential neighborhood primarily made up of single-family residences in the Stoney Ground neighborhood on the far western side of St. Croix. The Walter I.M. Hodge Pavilion public housing complex is located directly north of the facility. The immediate area around the facility is open grass with minimal landscaping.

The Arthur A. Richards Junior High School complex was included in the previous SHPO consultation: Determination of Eligibility, Public School Buildings on St. Croix for potential Federal Emergency Management (FEMA) Undertakings under DR-4335-VI and DR-4340-VI (Hurricanes Irma and Maria) dated November 24, 2017. The SHPO concurred on January 17, 2018 that the Arthur Richards School was not eligible for listing in the National Register of Historic Places (NRHP) due to Age (Attachment A). At present the complex has still not met the age requirement to be considered eligible for listing in the NRHP and it does not meet the level of exceptional importance required for NRHP Criteria Consideration G: Properties That Have Achieved Significance Within the Last Fifty Years. Therefore, FEMA has determined that the Arthur A. Richards Junior High School is not eligible for listing in the National Register of Historic Places.

Evelyn Williams Elementary School Complex

Evelyn Williams Elementary School was constructed in c. 1976. The complex is comprised of a collection of 13 stucco-covered buildings with hip or pyramidal roofs. The complex exhibits the presence of restrained Brutalist and earth-embanked architecture (Figure 5).

Brutalist architecture gained popularity between 1950-1980 and was typically found in municipal and government buildings. A character defining feature is the emphasis on structural design and bulky appearance. Construction surfaces make use of raw materials such as concrete, stone and brick. Earth-embanked architecture gained popularity in the 1970s as part of the Environmental Movement to save energy and use of less natural resources. Character-defining features are the blending of the building into its natural environment and using soil embankments to help insulate the building so the interior climate is more stable.

Twelve of the school buildings create a square arrangement of earthen-banked buildings, giving the appearance of one story being below ground with an exposed second story above the embankment (Photo 8). The arrangement of buildings is intentionally oriented to face an interior courtyard with covered walkways and an open concrete courtyard (Photo 11). One large Brutalist 2-story building (Figure 2-Building 8, and Photo 10), not part of the embanked outer complex, is located on the northwest corner of the interior courtyard. Building 8 creates a visual anchor for the interior of the Modern complex. The grand entry on the southeast corner of the building is situated at a high point of the interior courtyard facing southeast toward a large cafeteria building (Figure 2-Building 1, Photo 9). A series of concrete terraces with recessed stairways lead downward along a slope to a small sunken open concrete amphitheater near the lower southeast corner (Photo 10).

The overall arrangement of the school complex visible from the street appears heavily situated atop the earthen embankment (Photo 7). The exposed concrete exterior, while painted, displays the unfinished nature of the material. The Library (Building 8) was a good example of Brutalist architecture featuring vertically expressed stuccoed masonry walls and alternating glass walls that highlight its open floor plan. The building features angular geometric extended concrete walls stair-stepping upward in a tripartite arrangement. Windows were fixed and inset.

The school complex is located on St. Croix east of Fredericksted, between the Southwest and Southcentral neighborhoods. Located between Mt. Pleasant and Paradise Road and situated north of Melvin H. Evans Highway, the school complex sits in an open grassy area of a valley surrounded by single family residential neighborhoods of varied density.

The Evelyn Williams Elementary School complex was included in the previous SHPO consultation: Determination of Eligibility, Public School Buildings on St. Croix for potential Federal Emergency Management (FEMA) Undertakings under DR-4335-VI and DR-4340-VI

(Hurricanes Irma and Maria) dated November 24, 2017. The SHPO concurred on January 17, 2018 that the Evelyn Williams School complex was not eligible for listing in the NRHP due to age (Attachment A).

FEMA reevaluated the Evelyn Williams complex because it has reached 45 years of age since the SHPO consultation concurrence in 2018 and determined the complex as potentially eligible for listing in the NRHP under Criterion C, Architecture, as a good example of a restrained Brutalist and Modern style complex of buildings rarely found in the U.S. Virgin Islands. However, due to the abandonment of the complex and subsequent severe damage sustained during Hurricanes Irma and Maria, the school complex has suffered extensive and significant loss of its aspect of design, materials, workmanship, and association (Photos 7-13). Therefore, FEMA determines the Evelyn Williams Elementary School complex is not eligible for listing in the National Register of Historic Places.

Archaeology

Arthur Richards Junior High School

Table 1: Archaeological resources within a half (1/2) mile of the APE boundary (Figure 3).

Resource	Direction (feet)	Period	Effect
12VAm1-115 Smithfield 2	N	Historic	No effect
12VAm1-116 Stony Ground	E	Historic	No effect
12VAm1-185 Concordia SW	S	Historic	No effect
Aklis Archaeological Historic District NR: 76001852	SW	Historic/ Precontact	No effect
12VAm1-305 Hesselberg Cave	W	Precontact	No effect
12VAm1-087 Smithfield	NW	Precontact	No effect

Soils

According to the USDA Web Soil Survey, USDA Official Soil Series Description, and the 2000 Soil Survey of the United States Virgin Islands, the following soils occur in the APE (Table 2 and Figure 4).

Table 2: Soils in APE.

Unit	Soil type	Series Description
HeA	Hesselberg clay, 0 to 2 percent slopes	The Hesselberg series consist of shallow, well drained, moderately slowly permeable soils on ancient marine terraces. They formed in calcareous marine sediments. Near the type location, the mean annual air temperature is about 80 degrees F., and the mean annual precipitation is about 40 inches. Slopes range from 0 to 12 percent.
HeB	Hesselberg clay, 2 to 5 percent slopes	

Evelyn Williams Elementary School

Table 3: Archaeological resources within a half (1/2) mile of the APE boundary (Figure 7).

Resource	Direction (feet)	Period	Effect
12VAm1-080 Adventure	NE	Precontact	No effect
12VAm1-162 Paradise	SW	Historic	No effect
12VAm1-050 Mt. Pleasant	NW	Precontact	No effect
12VAm1-280 Mt. Pleasant Estate	NW	Historic	No effect
12VAm1-166/285 Plessen 2/Plessen Slave Village	NWN	Historic	No effect
12VAm1-016 Plessen	NWN	Precontact	No effect

Soils

According to the USDA Web Soil Survey, USDA Official Soil Series Description, and the 2000 Soil Survey of the United States Virgin Islands, the following soils occur in the APE (Table 4 and Figure 8).

Table 4: Soils in APE.

Unit	Soil type	Series Description
SiA	Sion clay, 0 to 2 percent slopes	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. Near the type location, the mean annual temperature is about 80 degrees F., and the mean annual precipitation is about 40 inches. Slopes range from 0 to 5 percent.
SiB	Sion clay, 2 to 5 percent slopes	
ArC	Arawak gravelly loam, 5 to 12 percent slopes, very stony	The Arawak series consists of shallow, well drained, slowly permeable soils on summits and side slopes of limestone hills and mountains. They formed in material weathered from soft limestone bedrock. Near the type location, the mean annual air temperature is about 80 degrees F. and the average annual precipitation is about 40 inches. Slopes range from 2 to 70 percent.

Determination of Effect

Based on the results of the historic property research and architectural identification, FEMA has determined that the V.I. Department of Education schools and are not eligible for listing in the National Register of Historic Places since they do not meet the 50-year age criteria or any Criteria Considerations. Additionally, since the APE has been previously disturbed by clearing, cut and filling, grading, and construction, it is unlikely that demolition of the existing school within the APE will encounter archaeological resources. Given the low probability of construction activities disturbing intact archaeological resources, FEMA finds the proposed Undertaking will result in No Historic Properties Affected.

FEMA requests concurrence with this determination of effect within fifteen (15) calendar days. Should you have any questions or need additional information please contact Carolyn A Nelson, SOI-Architectural History at carolyn.nelson@fema.dhs.gov or (340) 626-9746.; Christopher Koch, RPA, SOI-Archaeology at christopher.koch@associates.fema.dhs.gov or (404) 759-5816; or Sharla Azizi at: sharla.azizi@fema.dhs.gov or (202) 552-9015.

Sincerely,

**SHARLA C
AZIZI**

Sharla C. Azizi
Environmental and Historic Preservation
Advisor
DR-4335 and 4340-USVI

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Cc: Eboni Powell, Administrative Specialist, VI SHPO
David M. Brewer, Senior Archaeologist, VI SHPO

Attachments: SHPO Concurrence document
Attachment A – Determination of Eligibility, Public School Buildings on St. Croix

Figure 1: Arthur Richards Demolition Site Plan



Figure 2: Arthur Richards APE (red)



Figure 4: Arthur Richards Web Soil Survey map showing the soils in the vicinity of the APE (red)



Figure 5: Evelyn Williams Elementary School Proposed Demolition Site Plan



Figure 6: Evelyn Williams Elementary School APE (red)

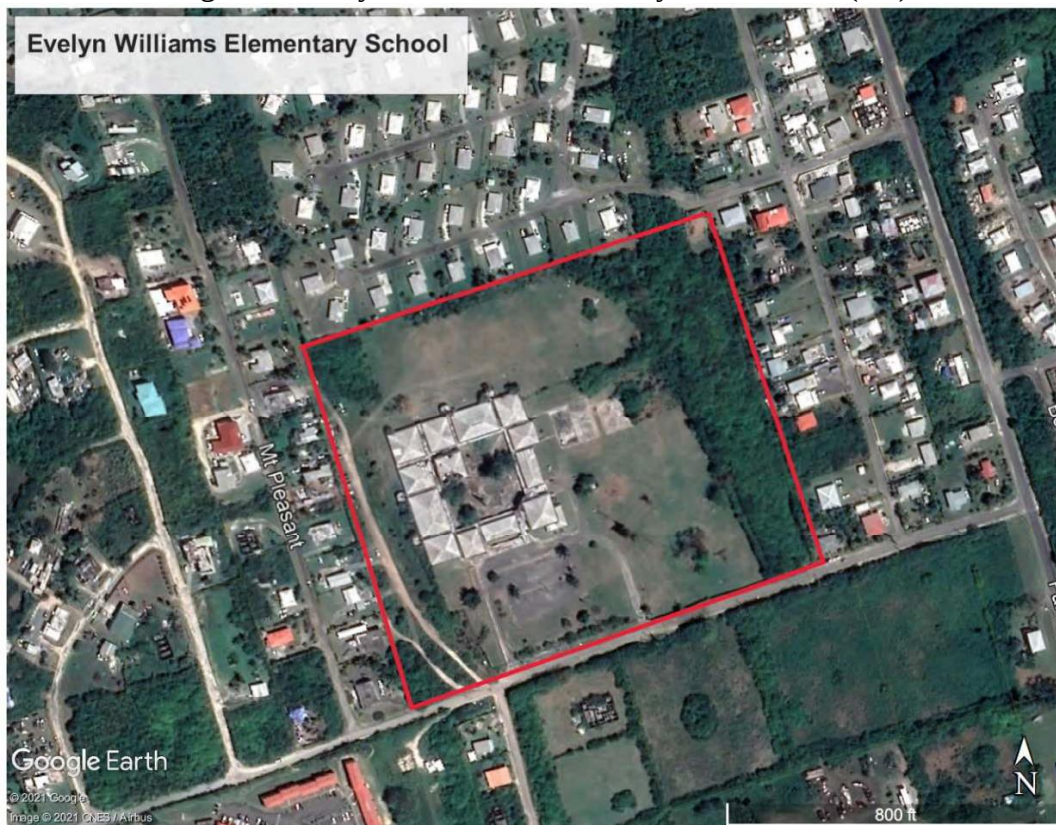


Figure 8: Evelyn Williams Elementary School Web Soil Survey map showing soils in the vicinity of the APE (in red)



PHOTOS

Photo 1: Arthur Richards Junior High School – Aerial View facing north



Photo 2: Arthur Richards west elevation (Building 1)



Photo 3: Arthur Richards Building 2 (east elevation) on left; Building 3 (south elevation) on right



Photo 4: Arthur Richards Building 5 (east elevation)



Photo 5: Arthur Richards Building 2 interior



Photo 6: Arthur Richards Building 4 interior

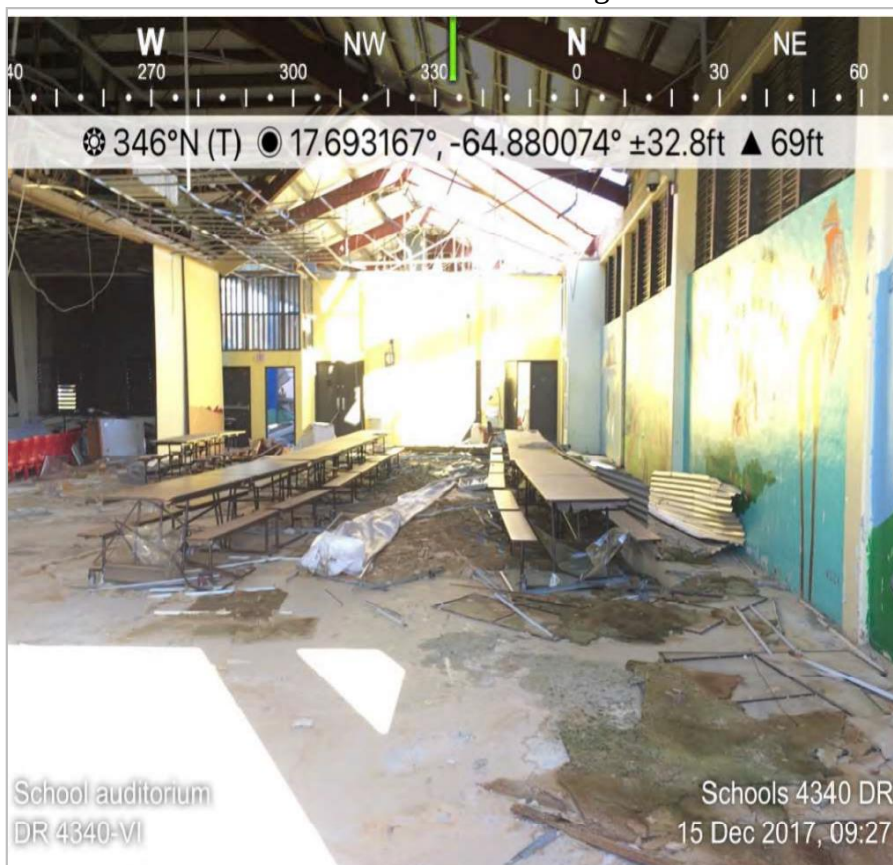


Photo 7: Evelyn Williams Façade View – Buildings 1-4 facing north



Photo 8: Evelyn Williams Building 4 – facing north



Photo 9: Evelyn Williams Buildings 1, 13, 12 East Elevation



Photo 10: Evelyn Williams Building 8, Library – facing northwest



Photo 11: Evelyn Williams Building 8, Library – facing west



Photo 12: Evelyn Williams interior

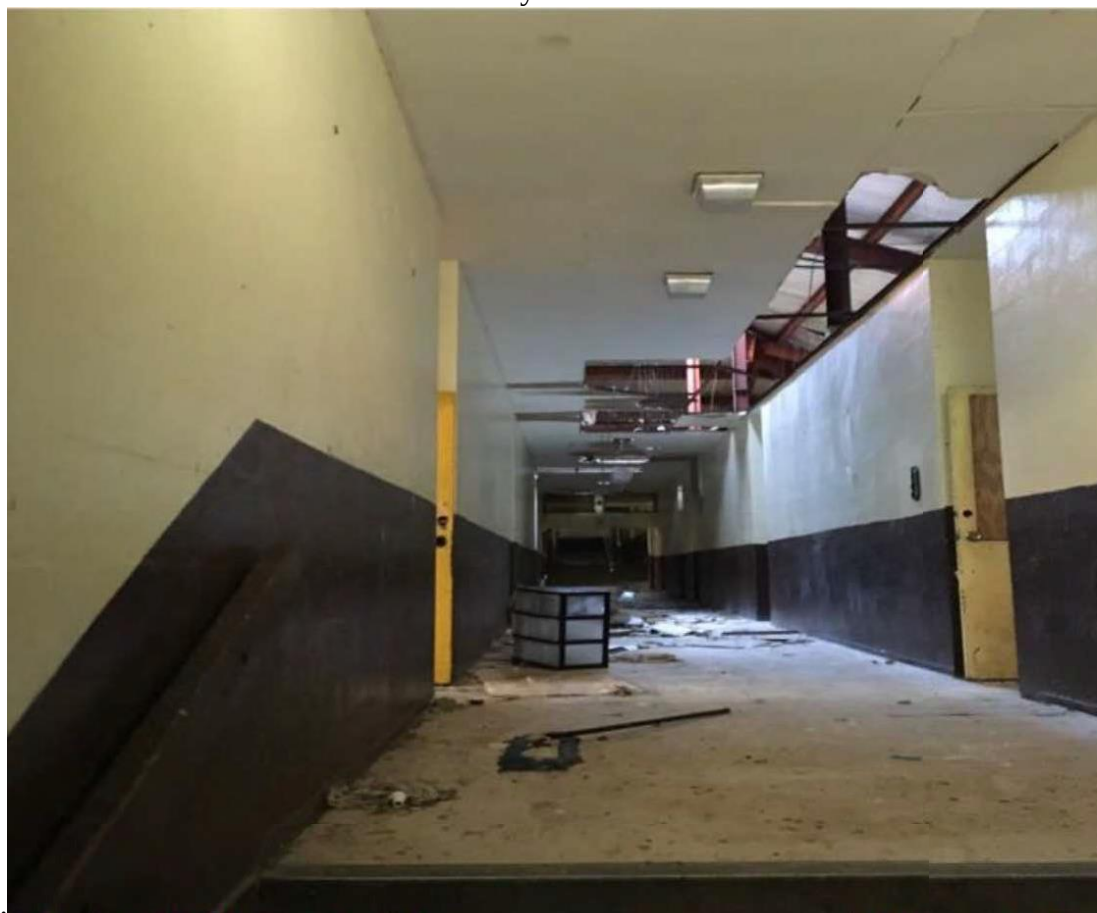


Photo 13: Evelyn Williams interior



Evelyn M. Williams ES
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