



**Germfree Laboratories**  
**4Sunshine Boulevard**  
**Ormond Beach, Florida 32174**

01 November 2022

Honorable Jean-Pierre Oriol, Commissioner  
Department of Planning and Natural Resources  
45 Estate Mars Hill,  
St. Croix, VI 00840

Re: Virgin Islands Department of Health (VIDOH) Request for Coastal Consistency Determination for the Germfree Modular Laboratory + EMS Relocation, Christiansted, USVI 00820

Dear Commissioner Oriol,

On behalf of Justa Encarnacion, Commissioner of the Virgin Islands Department of Health (VIDOH), and as Architect of Record, Silverberg Associates VI, P.C., Architects requests a decision of Coastal Consistency for the Germfree Modular Laboratory and temporary EMS facility's relocation from its current location on the Charles Harwood Memorial Complex site. The VIDOH is proposing to relocate these facilities one block to the north, onto a vacant land parcel known as "Remainder Parcel #11 Penitentiary Land", previous site of a portion of the now-demolished Chabert Housing Project. It should be noted that this site is outside of the designated boundary of CZM Tier 1.

The project's origin initiated on September 7, 2017, and then September 16, 2017, when Hurricanes Irma and Maria significantly damaged Department of Health (DOH) facilities throughout the three islands of the USVI. These back-to-back Category 5 hurricanes caused catastrophic structural damage and flooding to the Charles Harwood Medical Center (CHMC) and its six (6) outbuildings on the St. Croix campus. Resulting damages to the CHMC were so severe, a replacement for the Charles Harwood Medical Center was authorized by FEMA. As an interim measure to restore the critical functions of the VIDOH Laboratory, a new BSL-3 Temporary Laboratory was required. Public Health Laboratories (PHL) focus on diseases and the health status of population groups. They perform limited diagnostic testing, reference testing, and disease surveillance. They also provide emergency response support, perform applied research, and provide training for laboratory personnel.

The selected Vendor for the project, Germfree Laboratories, is an active vendor with the U.S. Virgin Islands, and has the highest manufacturing and expertise with biocontainment engineering controls. They have successfully placed and supported fully commissioned CDC-NIH compliant BSL-3 biosafety enclosures. As a sole source, Germfree Laboratories is the manufacturer and provider of all services and maintenance associated with these BSL-3 labs. The relocation of the labs and all its contents require highly skilled expertise that can only be provide by Germfree.

The original purpose of the Lab was to acquire a secure, compliant facility to conduct high containment laboratory testing, and also provide surge capacity for the Territory. After the 2017 hurricanes devastated the USVI, and prompted the condemnation of the Charles Harwood Hospital, the existing stand-alone Lab became the permanent solution for the territory's laboratory testing needs. This has allowed this soon-to-be-relocated facility to continue to function with little or no interruption of services to the community.

The Laboratory and its auxiliary equipment are a "permanent self-contained secure high containment Lab that will complement future clinical laboratories in the new proposed DOH building". It is a highly complex multi-million-dollar facility approved and funded by the Center for Disease Control (CDC). The space allotted to new lab functions



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in the proposed Charles Harwood Hospital will not be sufficient for a long-term public health lab. The Germfree Lab, along with allotted clinical lab space in the new hospital, will be adequate to perform testing in a secure, non-public space.

The decision to relocate the Labs and its storage facilities to this new location is based on its proximity to the Charles Harwood Hospital complex. This will allow for efficient and swift provision of services for the hospital and precludes the need to hire additional staff for another offsite location. The presence of the Lab in the new location will keep it within proximity of the newly built hospital complex and allow for ease of services between the Lab, the hospital, and its onsite clinics.

In addition to relocating all of its existing infrastructure, the Germfree Modular facilities are proposed to be expanded, almost doubling their present capacity. The importance of the smooth and continued operation of these facilities in service of the public health of the island's residents cannot be overstated. The Department of Health Lab is the only public health lab facility in the territory. The Lab and its staff have been highly instrumental in the success of the USVI Department of Health's response to the COVID-19 pandemic, by providing professional expertise, guidance, technical support, and testing, at a critical time in the Territory's history. Currently and in the future, it stands equipped and ready to meet the future testing response needs of the Territory.

A tentative construction-start timeframe of mid-December is anticipated. The required jurisdictional permits will be submitted in advance and all approvals are intended to be in-hand prior to the start of construction. The proposed activity is consistent with the requirements of the Virgin Islands Coastal Zone Management (CZM) Program to the maximum extent practicable. Attached to this cover letter is a detailed description of the project, including engineering plans, maps, and reports that illustrate the project's compliance with CZM mandates.

Should you have any questions or require any further clarifications, please do not hesitate to contact Dr. Brett Ellis of the VI Department of Health at 340-718-1311 or at [brett.ellis@doh.vi.gov](mailto:brett.ellis@doh.vi.gov), or Thomas Martin at [Tmartin@germfree.com](mailto:Tmartin@germfree.com) or our firm for any technical concerns related to the proposed work, at (609) 921-1867 ext. 244, or [silverbergp@silverberg-arch.com](mailto:silverbergp@silverberg-arch.com).

Thank you for your consideration of this request and this application.