UNITED STATES ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
COASTAL CONSISTENCY DETERMINATION REQUEST
SAVAN GUT PHASE II PROJECT, ST. THOMAS, U.S. VIRGIN ISLANDS

INTRODUCTION

The purpose of the project is to reduce flood damages to the Jane E. Tuitt Elementary School and the Central Business District in downtown Charlotte Amalie during a one-hour SPF (Standard Project Flood) published in Engineer Manual (EM) 1110-2-1411. Heavy rainfall in the upland catchment basin of Savan Gut causes rocks and other debris to be washed down the channel toward the sea. Two constrictions reduce flows so that the flood waters overflow the channel banks and flood the school as well as the business district. The Savan section of Charlotte Amalie has extremely high runoff rates due to the steep slopes in the upper basin. Flash floods from intense thunderstorms are a common event affecting this area and can occur anytime during the year. Effects from Hurricane Maria, which hit the island in September 2017, prompted the Corps to include the project for consideration for funding.

The initial project, authorized under the Continuing Authorities Program (CAP), Section 205 of the Flood Control Act of 1948 (Public Law 80-858), as amended (33 U.S.C. § 701s), was divided into two phases for preparation of plans, specifications, and construction with the U.S. Virgin Islands Department of Public Works (USVI DPW) as the Non-Federal Sponsor (NFS). Construction was complete on Phase I in April 1989 and Phase II was advertised in 1999. However, the bids received exceeded the government estimate and costs exceeding the Corps' statutory limit; therefore, Phase II of the project was not awarded for construction. Since Phase II has not been constructed, significant residual flooding impacts occur in Charlotte Amalie. The Final Savan Gut, CAP Conversion Feasibility Report was completed in 2020, which verifies the full project and Phase II as a standalone project (the unconstructed features) are both economically justified, environmentally acceptable, and feasible from an engineering standpoint and that no additional reformulation is needed.

The project is split into 2 phases:

- Phase I (complete in April 1989) consisted of 800 feet of constructed channel
- Phase II consists of a series of improvements to the gut further detailed in the next section.

PROJECT LOCATION

The Savan Gut project area is located in the capital, Charlotte Amalie, on the south side of St. Thomas, U.S. Virgin Islands, see Figure 1. The Savan section of the Charlotte Amalie community is within the 100-year flood plain adjacent to numerous residential, commercial, and public structures and utilities.

Figure 1 Savan Gut Project Location Latitude 18.346792˚ Longitude – 64.938022˚ to Latitude 18.342029˚ Longitude -64.934052˚

PROJECT DESCRIPTION

The open channel that connects the headwaters of Savan Gut to the drop box structure at Percy DeJongh Drive Bridge is approximately 370 feet long. This upstream channel meets the Percy DeJongh Drive Bridge, where the gut structure transitions to a series of CIP drop box structures that connects the upstream channel to the catchment basin. The structures consist of high sidewalls with a slab that drops three times, to dissipate flow. The sidewalls are extended above finished grade to provide pedestrian safety and scuppers are located at grade to allow exterior surface flow to enter the channel. The end of the drop structure includes a chamfered edge sill, slowing the flow of water into the catchment basin, which is directly upstream of the covered culvert. The culvert is roughly 1,594 feet long and consists of CIP culvert sections divided by water stopped construction joints. There is a 3-foot by 15-foot-wide wall at the bottom of the drop structure, a chamfered edge sill upstream, and the 3-foot weir downstream of the trash rack designed to effectively control and manage water flow through the Gut, helping the area in-between act as a large containment basin.

Savan Gut Phase II project consists of the following features, as shown in Figure 2.

- Construction of an improved 370-foot-long trapezoidal channel with 2:1 side slopes and rock lined surface upstream of the Percy DeJongh Bridge (station 20+36.44).

- A series of three (3) U-shaped drop structures between the Percy DeJongh Bridge (station 20+19.69) and the catchment basin (station 18+11.99). Construction of the drop structures will require temporary shoring due to its proximity to adjacent structures and properties (Contractor may choose to use a sheet pile and tie-back system).

- Catchment basin approximately 217 feet long between the drop structures (station 18+11.96) and the box culvert (station 15+94.69). The catchment basin has 2:1 vegetated side slopes and a rock-lined bed. Rock stairs on the southern side facilities access for Operation and Maintenance (O&M).

- Trash barrier (rack) and weir at the upstream limits of the box culvert (station 15+94.69). The weir includes an orifice at the base to allow for low flow.

- Construction of covered concrete channel (box culvert) approximately 1,594 feet in length. The upstream terminus is adjacent to Jane E. Tuitt Elementary School (channel station 15+94.00) and the downstream terminus is the interface with the Phase I project (channel station 00+00.00). Construction of the box culvert will require temporary shoring due to the close proximity of the project limits to private property and existing structures, and a pipe to allow for stormwater flows to bypass the active construction area.

- Replacement of three bridges at Percy DeJongh Drive, Irvin “Brownie” Brown Street, and the intersection of Gamle Gade and Store Strade. Contractor must maintain access throughout the community during construction and provide alternate vehicle traffic circulation patterns. Temporary maintenance of traffic will be required.

- Mitigation for cultural resources via the construction of (8) eight pocket parks, which includes a reconstructed basketball court and historic brick archway viewing area, linear trail above the box culvert which connects each of the pocket parks, protection of a historic archway, and salvage of culturally significant materials.

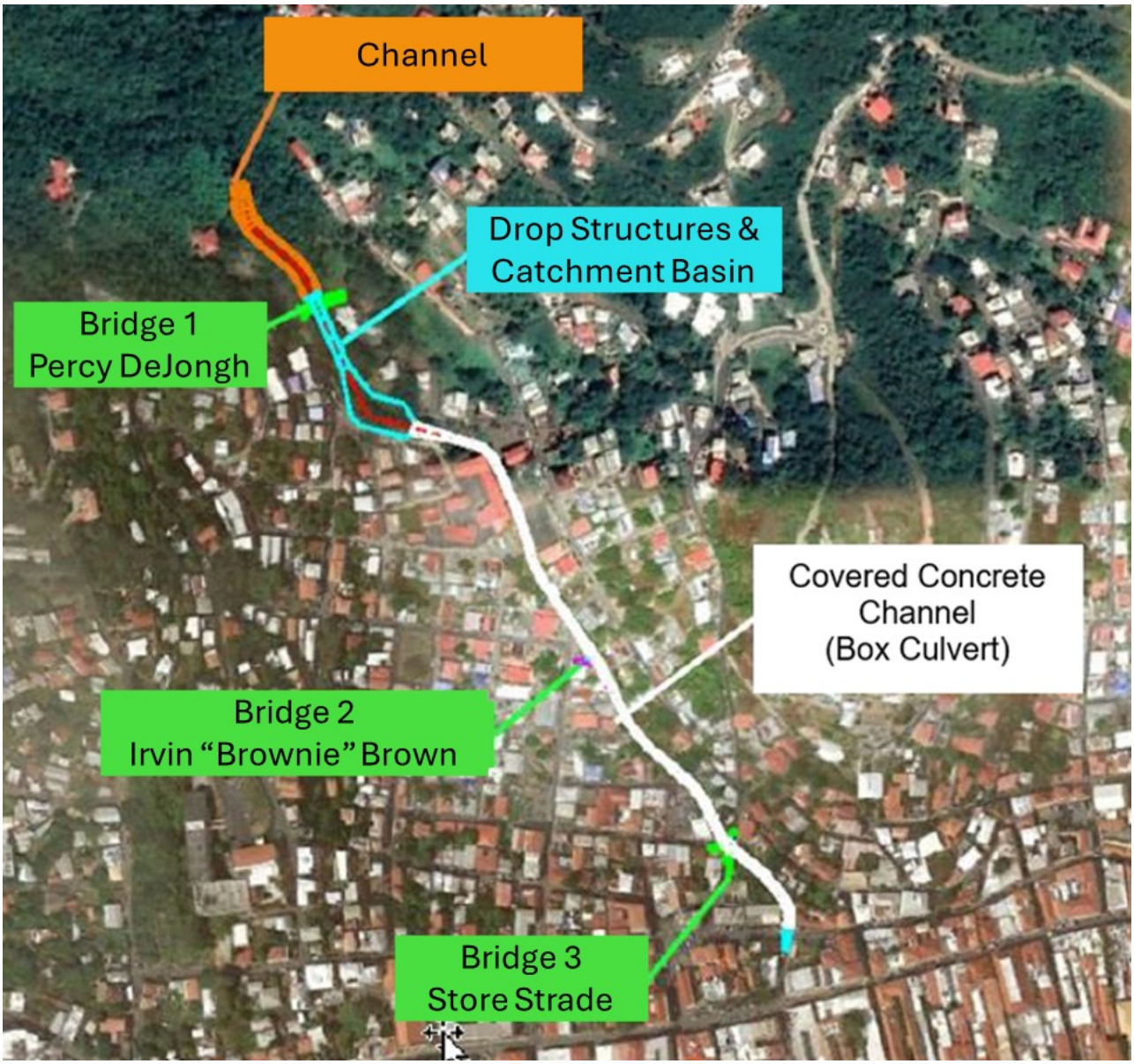

Figure 2 Aerial View of Savan Gut – Phase II

ENVIRONMENTAL IMPACTS

Climate/Weather

Once complete, the open channel will be affected by climate and weather. This includes rainfall and wind. Sedimentation and erosion controls will be implemented to ensure that rainfall will not result in sedimentation and erosion during construction. To prevent stagnation at the check weir, a “low flow” drainage orifice will be installed at the base of the weir to allow the basin to slowly drain during low flow events. The contractor will obtain coverage under the Construction General Permit (CGP) for stormwater prior to the start of construction.

The drainage channel has been designed to accommodate for Standard Project Flood (SPF), which is greater than a 100-year design storm.

Landform Geology, Soils and Historic Land Use

St. Thomas is composed of stratified volcanic and volcaniclastic rocks with minor limestone of the Early Cretaceous (Albain) to possibly the late Cretaceous Age (Donnelly 1966). These rocks are of granitic composition, some of which may be as young as Tertiary (Kesler and Sutter, 1979). The oldest rocks of St. John are submarine lavas (keratophyre and spilite), beds of volcanic debris and chert. Associated intrusive rocks of the Water Island Formation is overlain by andesitic volcanic and volcaniclastic rocks of the Louisenhoj Formation, which underlies the island of St. Thomas to the east and much of the northwestern portion of St. John. Donnelly (1966) suggested that the Louisenhoj Formation was deposited unconformably on the slopes and evirons of a subaerial volcanic island located roughly between St. Thomas and St. John, on the Water Island Formation after a period of emergence, tilting and erosion, an area now occupied by Pillsbury Sound. The youngest layered deposits on St. Thomas are volcaniclastic rocks of the Tutu Formation. Fossils contained in the Tutu Formation suggest that those deposits are of the Early Cretaceous (Albain) Age (Donnelly et. al. 1971). It appears that all the volcaniclastic rocks of St. Thomas were deposited in a relatively short period of time spanning 10 to 15 million years approximately 100 million years ago (D. Rankin 1988). St. Thomas is characterized by an irregular coastline, numerous bays, steep slopes and small drainage areas. For the most part the topography is very mountainous and coastal plains are almost completely absent. This results in the topography through which the drainage passes start at approximately 140ft of elevation meets Phase I of the Savan Gut at approximately 10ft.

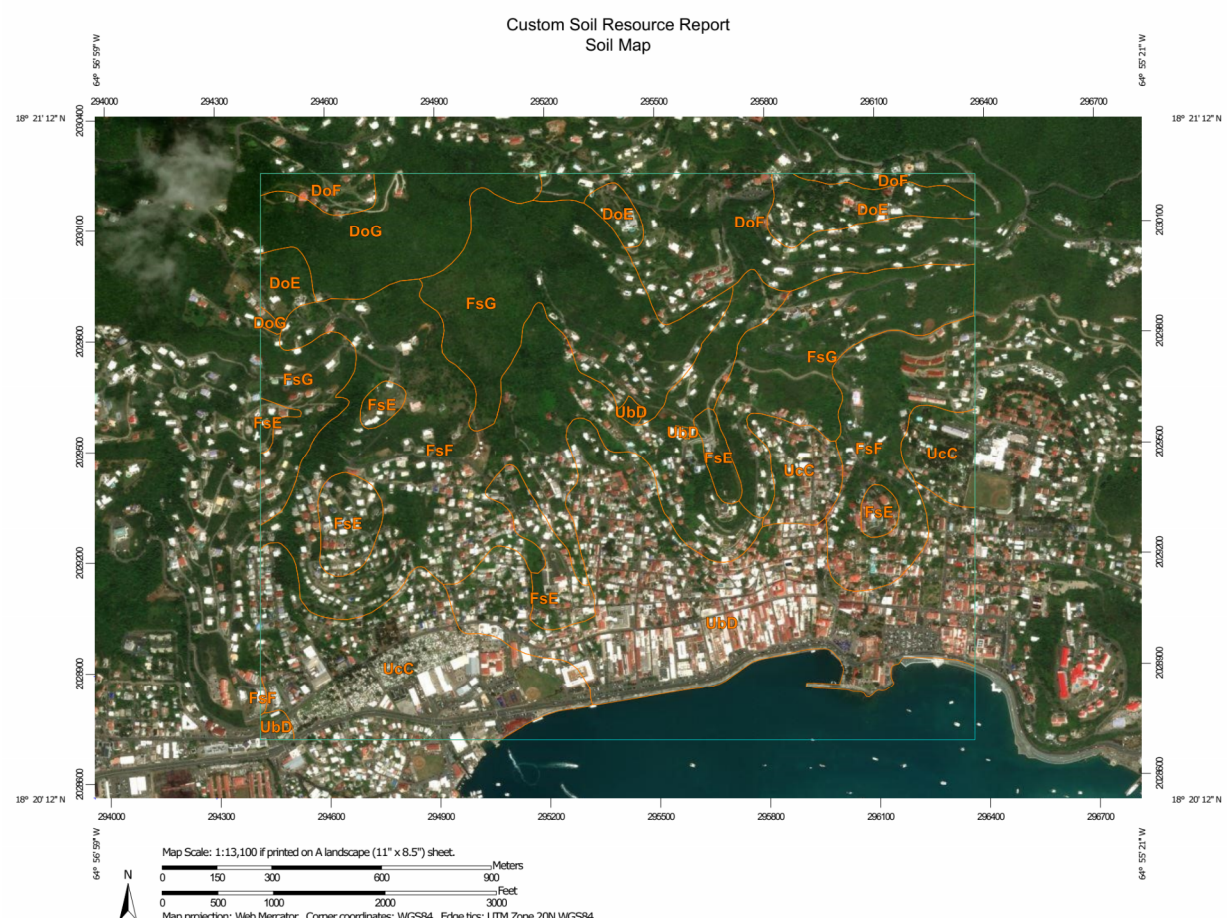

Figure 3 USDA NRCS Custom Soil Resources Map for Savan Gut.

The upper portion of Phase II starts in Fredriksdal-Susannaberg complex, 60 to 90 percent slopes extremely stony (FsG) and transitions into Fredriksdal-Susannaberg complex, 40 to 60 percent slope extremely stony (FsF) before reaching Phase I as the soil changes to Urban Land (UbD) as the project meets Phase I. Fredriksdal-Susannaberg complex, 60 to 90 percent slopes, and 40 to 60 percent slopes, extremely stony is found on mountain slopes, bedrock is present as shallow as 12 to 16 inches. The soils are well drained and are not prime farmland. Urban land is a uniformed soil which has been altered by man, soil is not prime farmland.

Drainage, Flooding and Erosion Control

The project is a stormwater flood control project and has been designed for Standard Project Flood (SPF), which is greater than a 100-year design storm. The design mitigates the flooding at the upstream end of the gut along Phase II but still shows some flooding in the downstream end, which is Phase I. However, the max levels at Phase I is less than or equal to that of existing conditions with no adverse impacts. The entire Gut can accommodate a 25-yr design storm with no flooding across the entire gut and better controls the stormwater through the residential and commercial areas.

Measures to control sedimentation and erosion will be implemented during all phases of the proposed project to ensure that rainfall will not impact the nearby drainage ways and water course during installation. In addition, any materials that need to be stockpiled overnight will be properly

stored so as not to be susceptible to run off. The project will apply for coverage under the General Construction Permit for stormwater due to its size. The design of erosion control measures is being developed in accordance with the 2022 US Virgina Islands Environmental Protection Handbook.

Drainage Patterns

The Savan Gut watershed drains 0.41 square miles (262.4 acres) and is located on the southern shore of central St. Thomas, U.S. Virgin Islands and encompasses a portion of the town of Charlotte Amalie. From its source in the high mountains of central St. Thomas, at Signal Hill, the poorly defined watercourse travels in a southeasterly direction for approximately 0.7 mile. A more defined channel continues in the southeasterly direction for 0.4 mile. The stream then enters an underground box culvert and flows south for approximately 0.2 mile, where the outflow discharge. The watershed that discharges into Savan Gut starts at Signal Hill and encompasses 262.4 acres.

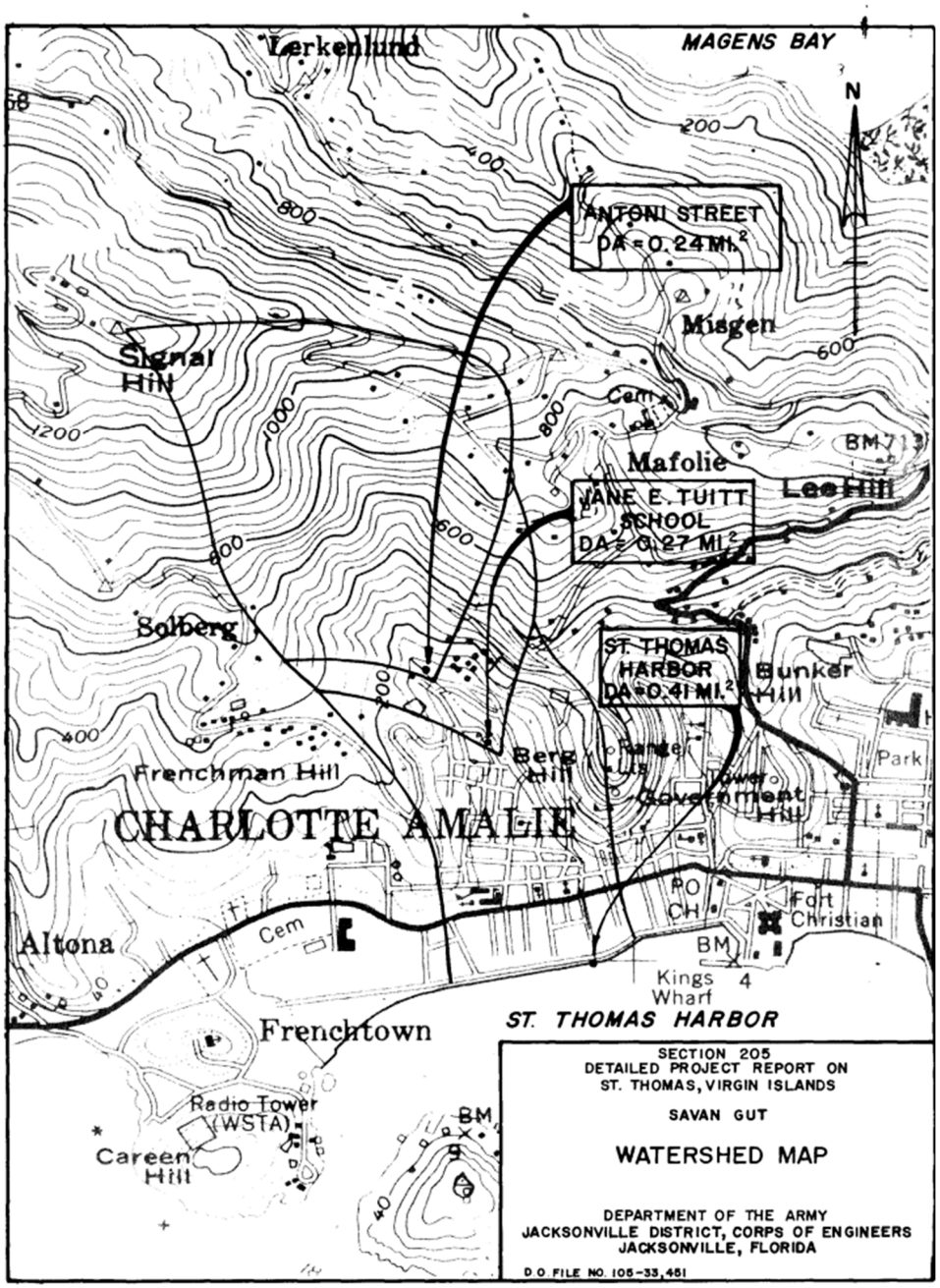

Figure 4 Watershed Map from the USACE 1982 Savan Gut Detailed Project Report

Coastal Floodplain

The project terminates at Zone AE where 100-year base flood elevations are determined to be EL +7 using Puerto Ric /US Virgin Islands State Plane (FIPSZONE 5200). The project is in Flood Zone X where 100-year coastal flooding is not expected as shown on FEMA FIRM Panel 26 or 94 April 16, 2007.

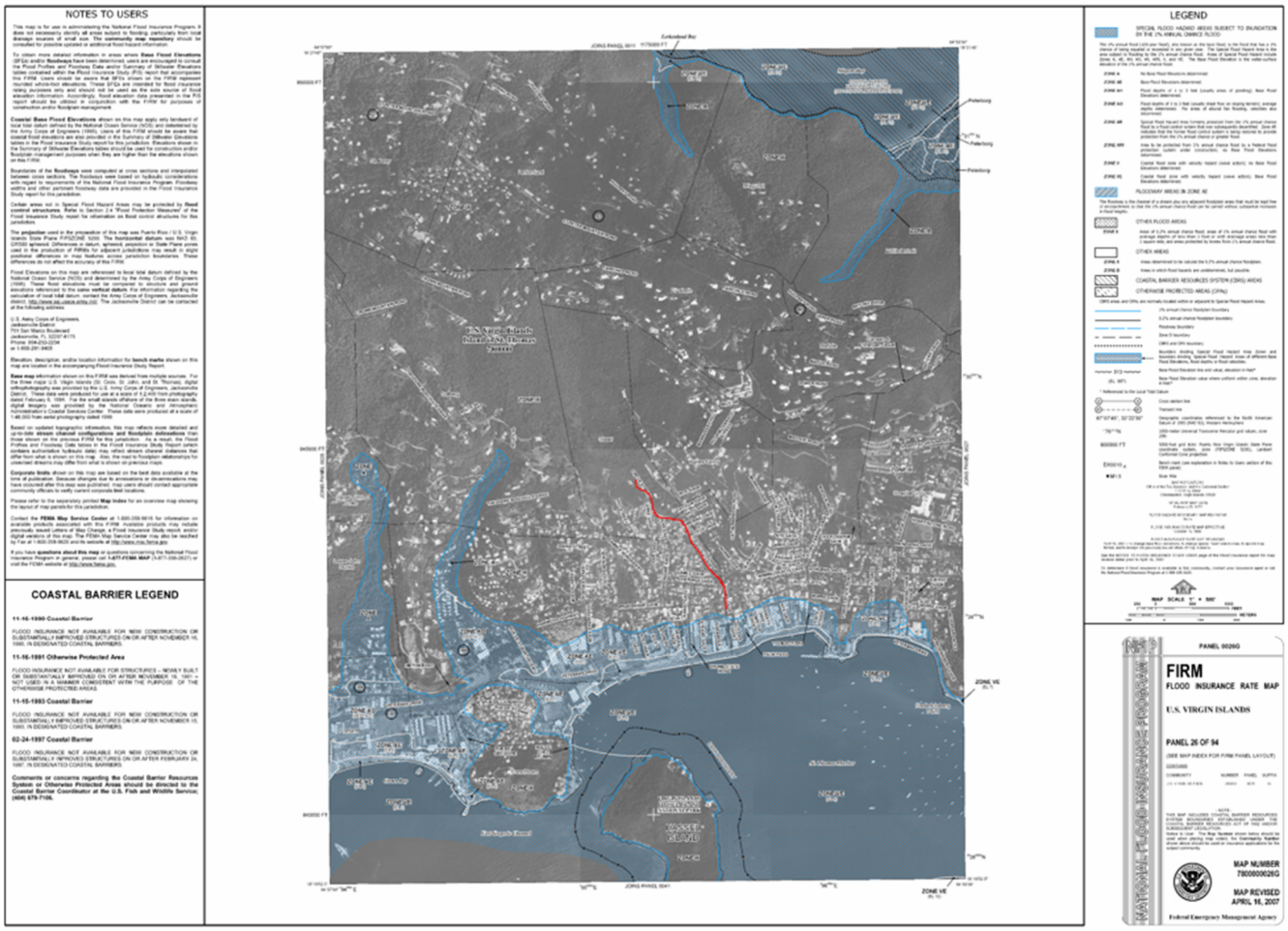

Figure 5 *FEMA Flood Insurance Rate Map (FIRM) for the proposed Savan Gut Phase II Project Area*

Figure 6 FEMA Flood Insurance Rate Map (FIRM) for the proposed Savan Gut Phase II Project Area

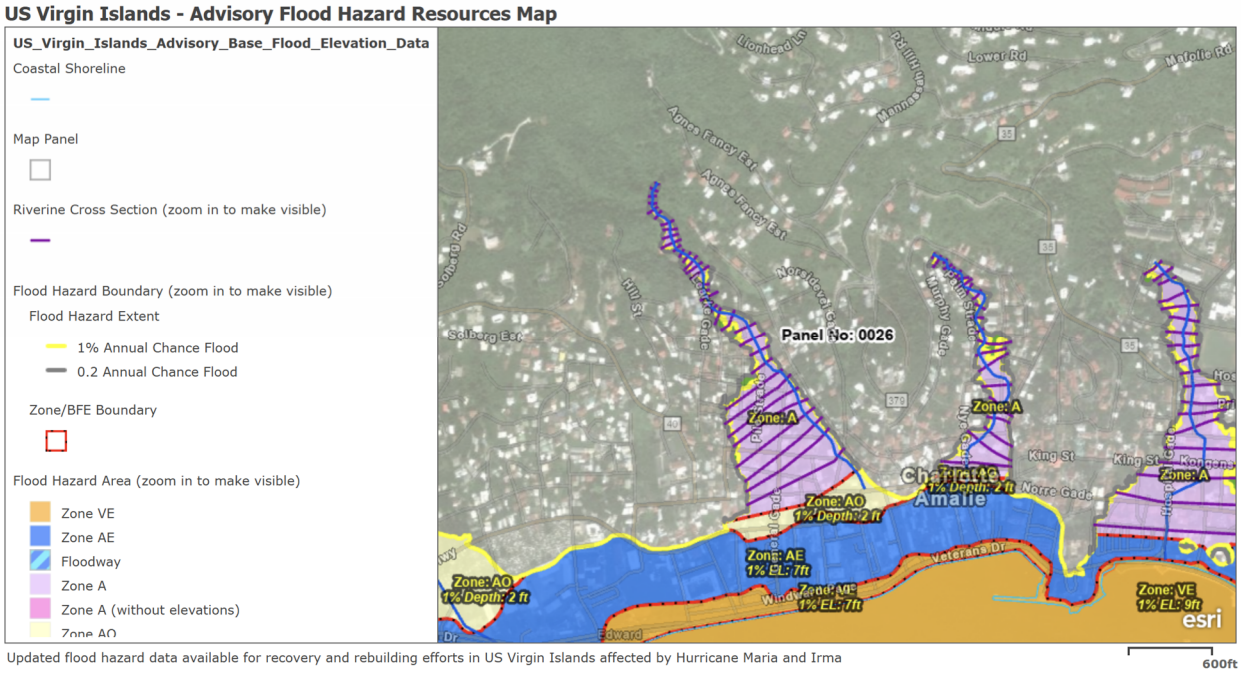

Figure 7 U.S. Virgin Islands Advisory Flood Hazard Map

The U.S. Virgin Islands Advisory Flood Hazard Map shows the draiange in Zone A where 100 year flood elevations have not been determined.

The open channel, drop structures and catchment basin will not be placed in a floodzone. The existing three (3) bridges that are to be replaced are also not in a floodzone. The existing pocket parks are also not in a floodzone.

During construction care will be taken not to stock pile soils within area of designated flooding.

Fresh Water Resources

The proposed project will have no impact on freshwater resources. No freshwater ponds or streams occur within the proposed project footprint. The groundwater resources within the area are perched and follows the ground topography. The project will continue to allow infiltration of runoff water.

Oceanography

The project location is well inland and will not be affected by sea storm events. The project will implement stormwater controls during construction and will apply for coverage under the General Stormwater Permit for construction and will be the required monitoring of the controls. Water quality monitoring will be implemented during construction to monitor the effectiveness of the implemented controls, so that if controls need to be repaired or are found to be inadequate repairs or additional measures will need to be implemented. If properly implemented the project should not create sediment laden runoff which could impact marine water quality.

Marine Resources

The property is located entirely inland and will have no direct impact on the marine environment. As describe above sedimentation and erosion control measures will be implemented and monitored to protect water quality and therefore the marine environment.

Terrestrial Resources

Some minor cutting or clearing of tree roots and shrubs will occur due to the proximity of some of the trees and the project site. A large kapok tree *(Ceiba pentandra*) will have to be removed to reconstruct one of the bridges. To mitigate the impacted kapok tree, replacement of heritage trees such as *Lingnum Vitae*, can be used on a 1:1 ratio as part of the landscaping of the pocket parks.

An arborist will be hired for the project to monitor/advise. Any vegetative debris will be mulched.

Wetlands

The U.S. Army Corps of Engineers defines wetlands as "those areas that are periodically inundated or saturated by surface or groundwater at a frequency and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, bogs, marshes and similar areas." (U.S. Army Corps of Engineers, 1986).

Wetland boundaries at the Savan Gut were identified in accordance with the Corps of Engineers Wetland Delineation Manual (1987) and U.S. Army Corps of Engineers (USACE) (2010) Regional

Supplement to the Corps of Engineers Wetland Delineation Manual: Caribbean Islands Region (Version 2.0) (ERDC/EL TR-11-4) (USACE, 2011). In May 2023 SCOTUS's decision in the case of Sackett v. EPA determined that only, "wetlands with a continuous surface connection to bodies that are waters of the United States," are to be federally protected. Because there no direct surface connection there are no jurisdictional waters within the project area. The FWS Wetland Inventory identifies Savan Gut as Riverine.

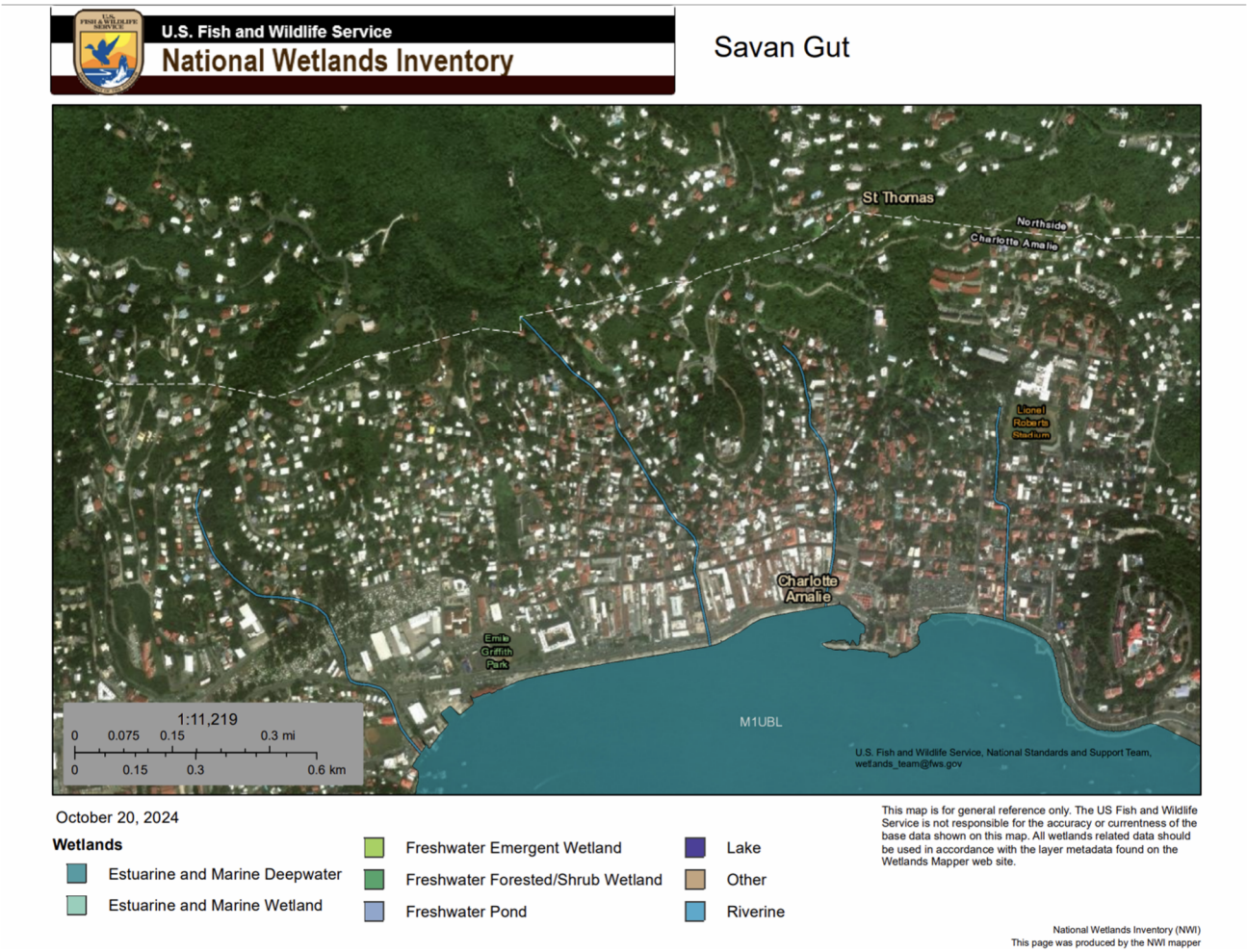

Figure 8 FWS Service Wetland Inventory

Rare and Endangered Species

According to the U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation System (iPAC) project tool, there are two (2) threatened or endangered species that habitat within the proposed project route; the roseate tern and the Virgin Islands tree boa. There are no critical habitats at this location.

The roseate tern is a threatened species on USVI. No Special Rule Publications are currently available for this species.

The Virgin Islands tree boa is listed as an endangered species on USVI. The U.S. Fish and Wildlife Service Caribbean Ecological Services Field Office has listed the following conservation measures for the USVI:

1. Contact Government of the Virgin Islands, Department of Planning and Natural Resources, Division of Fish and Wildlife (DFW) at (340) 775-6762, for consultation.
2. DFW will come out for an on-site discussion. They will need a copy of your building plans or a narrative of your intended project. DFW will coordinate via email so that all developers, owners, contractors, and other agencies, can follow along and provide input.
3. DFW will conduct a short VI boa training session for all individuals conducting hand clearing. This will involve discussions on what to do if a boa is encountered as well as boa identification. This can be done any time prior to hand clearing but is often preformed the first day on site. Photographs of the VI boa are to be prominently displayed at the site.
4. At least 5 days prior to the use of heavy equipment on the site, the site vegetation may be cut by hand. Any stone walls or naturally occurring rock piles must be carefully dismantled by hand as these are refuges for the snake. This will allow any boas present to vacate the site without injury.
5. Only hand clearing of vegetation is to be performed. This allows the use of chainsaws cutting vegetation down to less than 36 inches off the ground.
6. If a VI boa is found within any of the working or construction areas, activities should stop at the area where the VI boa is found. If boas need to be captured immediately to continue work and avoid harming the boa during the project activities, designated personnel shall immediately contact the DFW for safe capture and relocation.
7. DFW should be notified of any snakes observed.
8. Another site visit will be performed by DFW to confirm that hand clearing has been completed to our standards. The waiting period clock starts after inspection.
9. The site is to be left undisturbed for 5 days prior to the use of heavy machinery. However manual work may continue to be performed during this time and any vegetation may be moved by hand.
10. Use of heavy equipment is only permitted to start after the agreed upon date.

There are three (3) endangered plant species found on St. Thomas – i.e., *Calyptranthes thomasiana*, *Zanthoxylum thomasianum* (St. Thomas prickly-ash), and *Peperomia wheeleri* (Wheeler's peperomia). None of these species were seen along the drainage way.

Air Quality

All of St. Thomas 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). Excavators and other heavy equipment will be used during project construction and will create combustion engine exhaust during use. Upon the completion, air quality will return to pre-construction conditions.

IMPACT ON MAN'S ENVIRONMENT

Land and Water Use Plans

The construction of the open channel, drop structures and catchment basin, replacement of bridges and landscaping improvements are acceptable in all zoning designations and is in accordance with the laws and regulations of the U.S. Virgin Islands.

Visual Impacts

The improvement of the upstream channel, drop structures and catchment basin, and box culvert will provide a clear path for excess water & debris to travel. The replacement of the three (3) existing bridges will provide visual improvement of St. Thomas's roadway. The landscape improvements to the pocket parks and areas along the project path provides visual improvements of St. Thomas's natural landscape.

Social Impacts and Economic Impacts

Providing a reliable and structured path for water and debris to travel during major rainfall and flood events will benefit both residents and businesses on the island. The improvements will mitigate flood damage to roadways, residences, public schools and businesses.

Historical and Archaeological Resources

Previous consultation with the USVI Historic Preservation Office (SHPO) and a current review of the listing of the National Register of Historic Places (NRHP) indicates the Savan Gut Phase II Project's area of potential effect (APE) includes the Charlotte Amalie Historic District listed on the NRHP in 1976 (see Figure 6). The historic district then included 574 contributing buildings, three contributing structures, and a contributing object. The Charlotte Amalie Historic District includes buildings, dwellings, and sites that represent the town's early colonization and rich history. Important features in the district include Fort Christian, a National Historic Site constructed circa 1666 and completed in 1680; Skystborg (Blackbeard's Castle), a watchtower overlooking the harbor built by the Danes in 1678; and Emancipation Park, commemorating the emancipation of slaves by Governor Peter von Scholten in 1848. The architecture extant in the Charlotte Amalie Historic District especially in the project area's residential section known as "The Savanne" or "Savan" spans three centuries having great significance in understanding the historical development of the town of Charlotte Amalie. This area west of Denmark Hill was laid out in a grid plan in 1764 and is predominantly single family residential in use with some commercial buildings bordering its eastern boundary. Cottages in the Savanne areas are almost exclusively single-storied buildings of frame construction with shingled hip roofs.

Based on the presence of existing cultural resources and standing structures within the Charlotte Amalie Historic District and high probability for additional historic properties to be identified within the project's APE, a cultural resources survey of the proposed Savan Gut alignment was conducted (Righter and Mitchell 1981). As a result of this cultural resources survey, archaeological monitoring during construction and further documentation of extant structures and features to the HABS/HAER standards was recommended to be the most effective method for identifying and evaluating historic properties that would potentially be adversely affected by the proposed Savan Gut Phase II undertaking. Following this survey, and due to monetary constraints, the Corps developed a historic preservation mitigation plan with the USVI SHPO to divide the Corps' Savan Gut Phase II Project into two mitigation planning phases (identified as Phase II and Phase III in the historic preservation mitigation plan). As a result, the Corps' Savan

Gut Phase II Project reduced the northern extent of the flood control footprint. Subsequently, for both of the historic preservation mitigation Phase II and Phase III plans, it was agreed that the Contractor would be required to monitor and control construction vibrations that may affect historic structures. Specifically, the Phase I plan called for the Contractor to dismantle and record to HABS/HAER standards, the two historic ovens, the General Gade bridge arch and wall, and the historical architectural features in the deJongh wall. The historically significant brick from the dismantled historic properties was to be stored on the Department of Public Works property during Phase II of the historic preservation mitigation plan. The ovens were then to be rebuilt and the architectural features of the bridge arch and wall and the deJongh wall were to be incorporated into the flood control project during Phase III of the historic preservation mitigation plan. In addition, all of the remaining restoration work including the Barnaba Well, and placement of the commemorative plaque was to be deferred to Phase III of the historic preservation mitigation plan.

Due to the age of these previous surveys and evaluations, the current Savan Gut Phase II Project requires renewed coordination and consultation with the USVI SHPO as changes in criteria for evaluating historic properties need to meet current standards to fulfill the requirements of Section 106 of the National Historic Preservation Act (36 CFR Part 800). Additional cultural resources surveys are needed to conduct a phased identification and evaluation of historic properties during the project's PED phase. The Corps executed a Programmatic Agreement with USVI Historic Preservation Officer (SHPO) on October 30, 2019. The Programmatic Agreement outlines the process in which the Corps will consult with the agencies to avoid, minimize, and mitigate adverse effects to historic. The USVI SHPO and USACE are currently working together to agree and execute a Historic Properties Treatment Plan specific to this phase of the project.

Figure 9 St. Thomas, USVI National Register of Historic Places: Cultural Resources and Historic District in vicinity of Savan Gut Phase II Project. (SOURCE: National Park Service)

Waste Disposal and Accidental Spills

Equipment will be kept in good operational condition during the proposed project work and will not be fueled on site. Any excess excavated material and debris will be collected, taken off-site and properly disposed of.

If any hazardous materials are encountered or created, they will be taken back to the storage site associated with the project with the proper paperwork. No hazardous materials will be stored overnight.

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COASTAL CONSISTENCY

The proposed Savan Gut Phase II project has a negligible potential of impacting environmental resources, or ambient water quality during construction. A General Stormwater Permit for construction will be obtained by the installation contractor(s) and sedimentation and erosion control measures will be implemented during construction to ensure that no environmental impacts occur. The proposed project will occur only within the project limits and archeological monitoring will be conducted to minimize impact on historical or cultural resources. Project activities 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 Savan Gut Phase II Project, as proposed, will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the U.S. Virgin Islands' CZM Program. This federal consistency determination demonstrates the Savan Gut Phase II 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 Savan Gut Phase II 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 United States Virgin Islands.

- The proposed Savan Gut Phase II project is designed to mitigate flooding and damages to the public schools, residences and Central Business District in downtown Charlotte Amalie in St. Thomas, USVI. The project will not impact any natural resources and will improve visual roadways, bridges and landscape along the project site.

(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.

- This proposed project promotes the economic development and growth in the coastal zone by mitigating flooding to critical island infrastructure. The improved resilience of flooding on the island of St. Thomas is beneficial for normal weather events and in the event of future catastrophic weather events.

(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 involves flood mitigation and structure improvements 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 United States Virgin Islands.

- The proposed project will provide flood mitigation and structure improvements of critical island infrastructure and, therefore, will meet and protect the economic and social needs of residents of the island of St. Thomas.

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 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.

(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 and will monitor during construction 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 and will not result in the creation of wastewater. The project will implement sedimentation and erosion control BMPs to prevent loss of sediment from the project site.

The proposed Savan Gut Phase II project, as designed, will maintain coastal water quality through control of erosion, sedimentation, runoff, and siltation and therefore is consistent with the policy set forth in the USVI Code Title 12, Conservation Chapter 21, Virgin Islands Coastal Zone Management [V.I. Code tit. 12, § 903 (b)].

The proposed Savan Gut Phase II project, as designed, protects, maintains, preserves, and enhances 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. It is therefore consistent with the policy V.I. Code tit. 12, § 903 (b).