

An aerial photograph of a residential neighborhood on St. Thomas, U.S. Virgin Islands. The image shows a mix of residential buildings with various roof colors (orange, grey, white) and greenery. A prominent feature is a large, modern school building with a unique, multi-lobed, star-like architectural design, located in the center of the image. The school is surrounded by a mix of developed and undeveloped land.

Virgin Islands Department of Education  
Federal Consistency Determination Request

Emanuel Benjamin Oliver PreK-8 School  
St. Thomas, U.S. Virgin Islands

Submitted to

The Department of Planning and Natural Resources  
Division of Coastal Zone Management

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## INTRODUCTION

The Virgin Islands Department of Education (VIDE) is undertaking the Renovation and Moderation of Schools throughout the territory. VIDE has been able to secure Federal Emergency Management Grants Administration funding for these projects. VIDE is therefore respectfully requesting a Determination of Federal Consistency through the Department of Planning and Natural Resources, Division of Coastal Zone Management for the FEMA funded project – Emanuel Benjamin Oliver PreK-8 School renovation/modernization as required under the VI Code Section 1, VIR and Regs. Title 12, Subchapter 904, section 904-8.

The Pre-Application meeting was held in August 27, 2025.

## LOCATION

The Emanuel Benjamin Oliver PreK-8 School is located on Rem 148-235, Estate Annas Retreat, New Quarter, St. Thomas, at Latitude 18.335792°N, Longitude -64.885797° W.

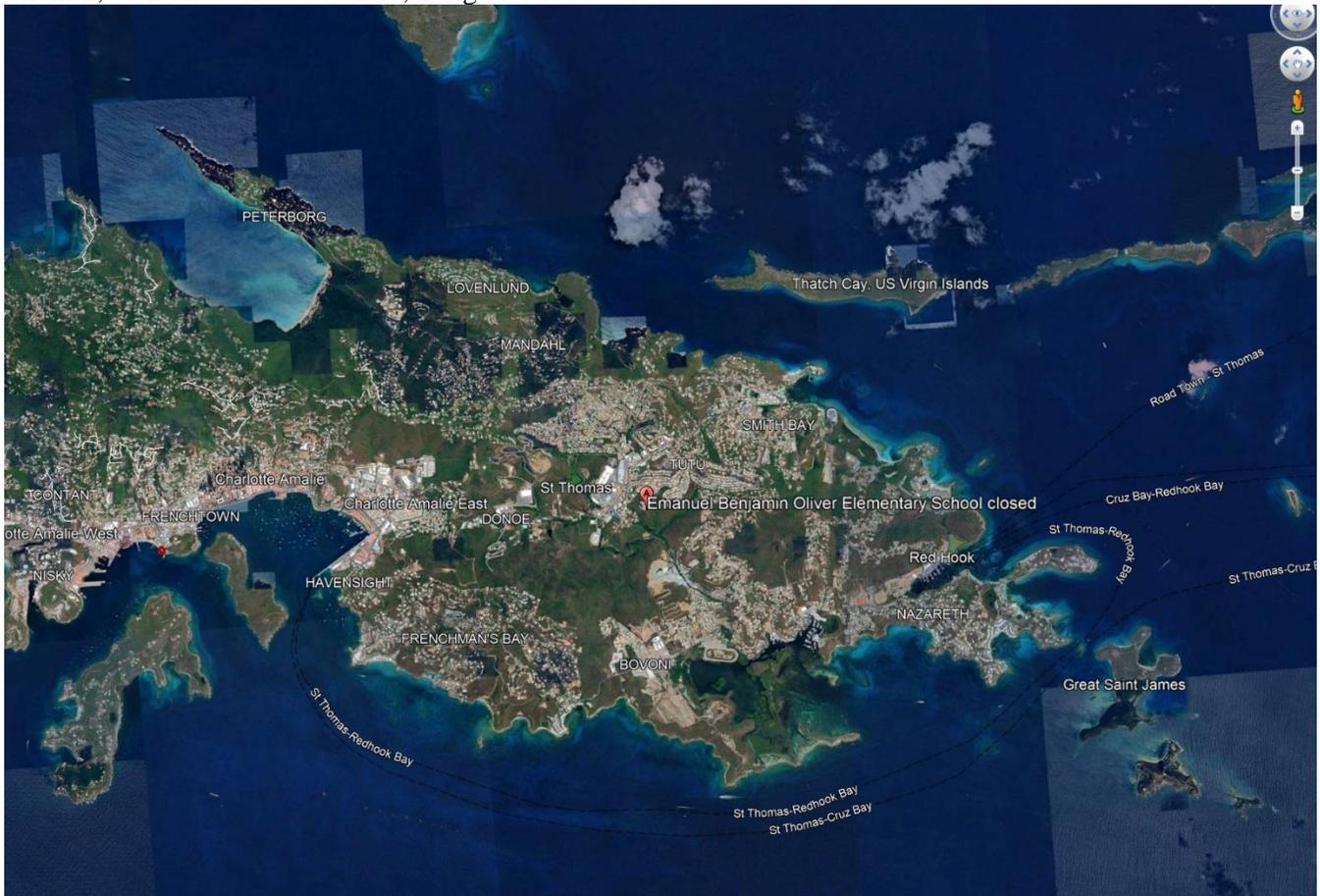


Figure 1. Location of Emanuel Benjamin Oliver PreK-8 School on the island of St. Thomas

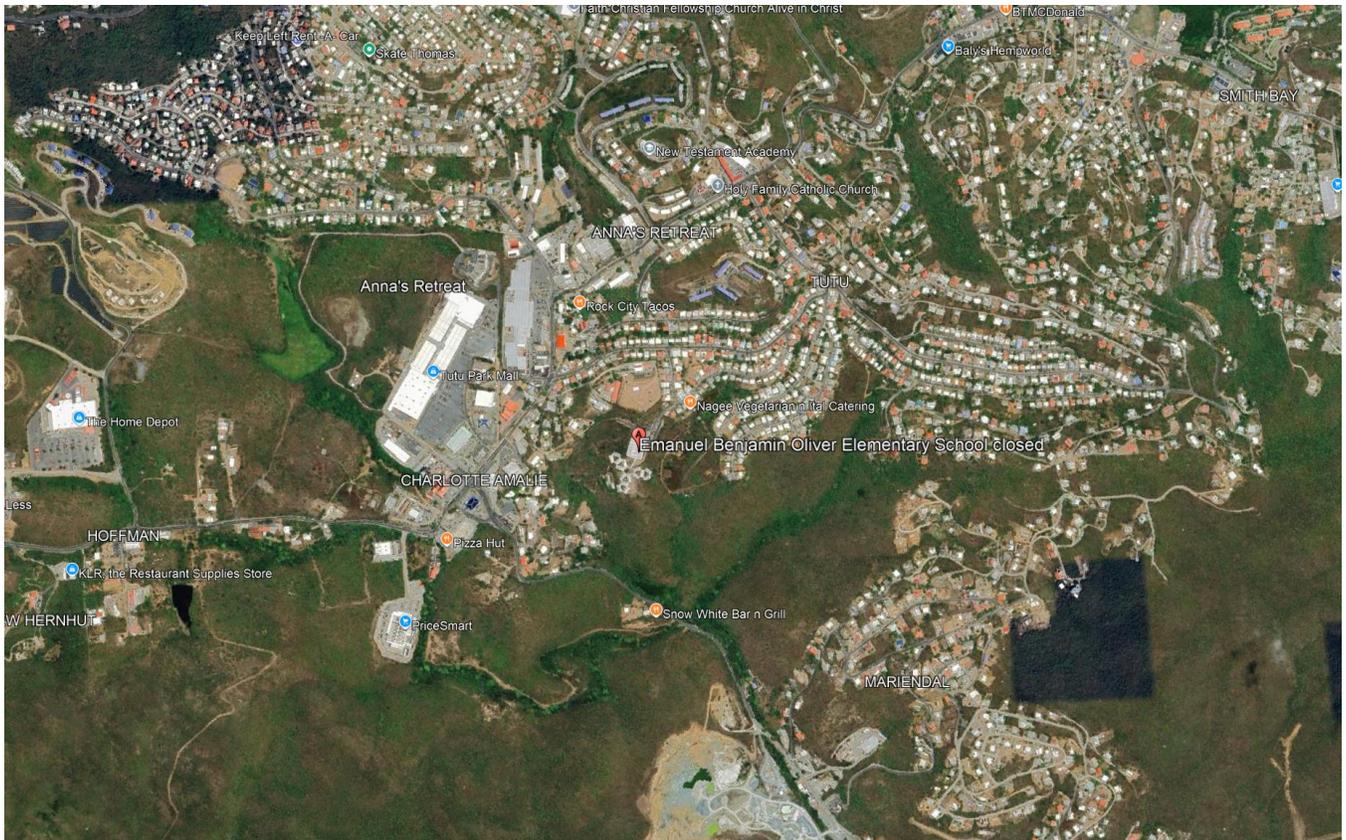


Figure 2. Location of Emanuel Benjamin Oliver PreK-8 School relationship to surrounding island features.

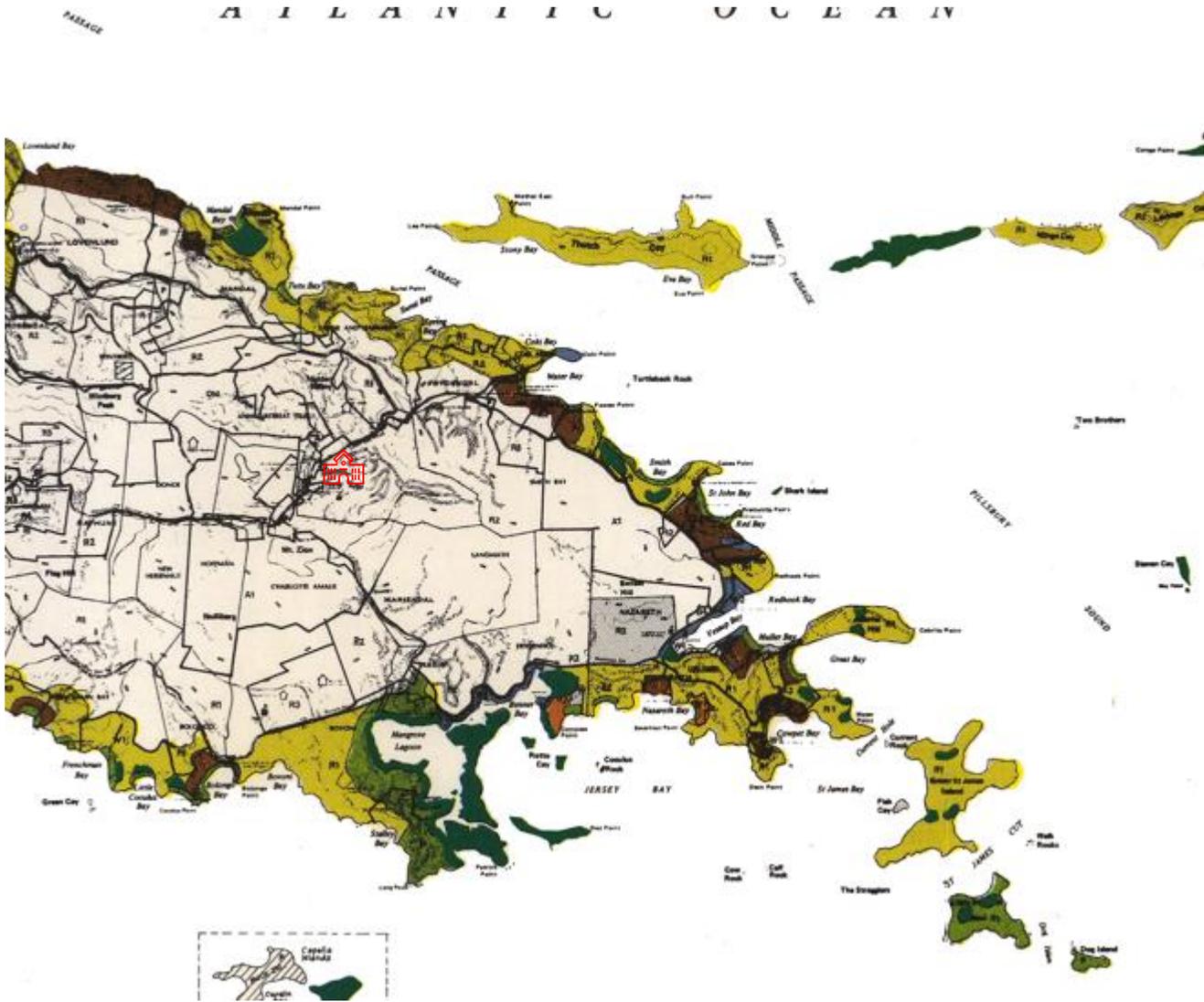


Figure 3. Location of Emanuel Benjamin Oliver PreK-8 School in relationship to the Coastal Zone Management First Tier Jurisdiction Limit

Although the project is outside the first-tier jurisdiction limit of Coastal Zone Management, the project is required to obtain a Federal Consistency Determination. 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 project must 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 this projects 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)].

## DESCRIPTION OF PROJECT

The Emanuel Benjamin Oliver PreK-8 School was damaged during the 2017 Hurricane Irma and Maria category V storms and was deemed unsafe for students, and faculty and remains closed. Emanuel Benjamin Oliver PreK-8 School has been assessed by FEMA and approved for renovation/modernization and the addition of new buildings.

The purpose of the project is to meet the current and future demand for student space at the Emanuel Benjamin Oliver PreK-8 School.

Renovation of Emanuel Benjamin Oliver PreK-8 School encompasses the demolition and reconstruction of the school. The renovations include the administrative offices, library, cafeteria, kitchen, bathrooms, stairways, balconies, theater, hallways and all fixtures and equipment. The project will meet VIDE's vision outlined in the Bridging Documents, under the FEMA Public Assistance (PA) program utilizing the flexibility afforded by the Bipartisan Budget Act (BBA).

All buildings, parking lots, drives and sidewalks within the existing school site will be demolished. The reconstruction includes a new entrance drive and parking along the northern portion of the site. A new utility building will be built on the far west of the site. The new campus will include four new buildings in total: two two-story buildings, one for administration and one for classrooms, along with a one-story dining building and a one-story gymnasium. All buildings will be arranged around a central open courtyard. Additionally, a new outdoor sport court will be located between the gym and the southern classroom building, and a new playground will be situated between the administration and classroom buildings.

The project is planned to be completed in a single construction phase over an estimated 25-month timeline.

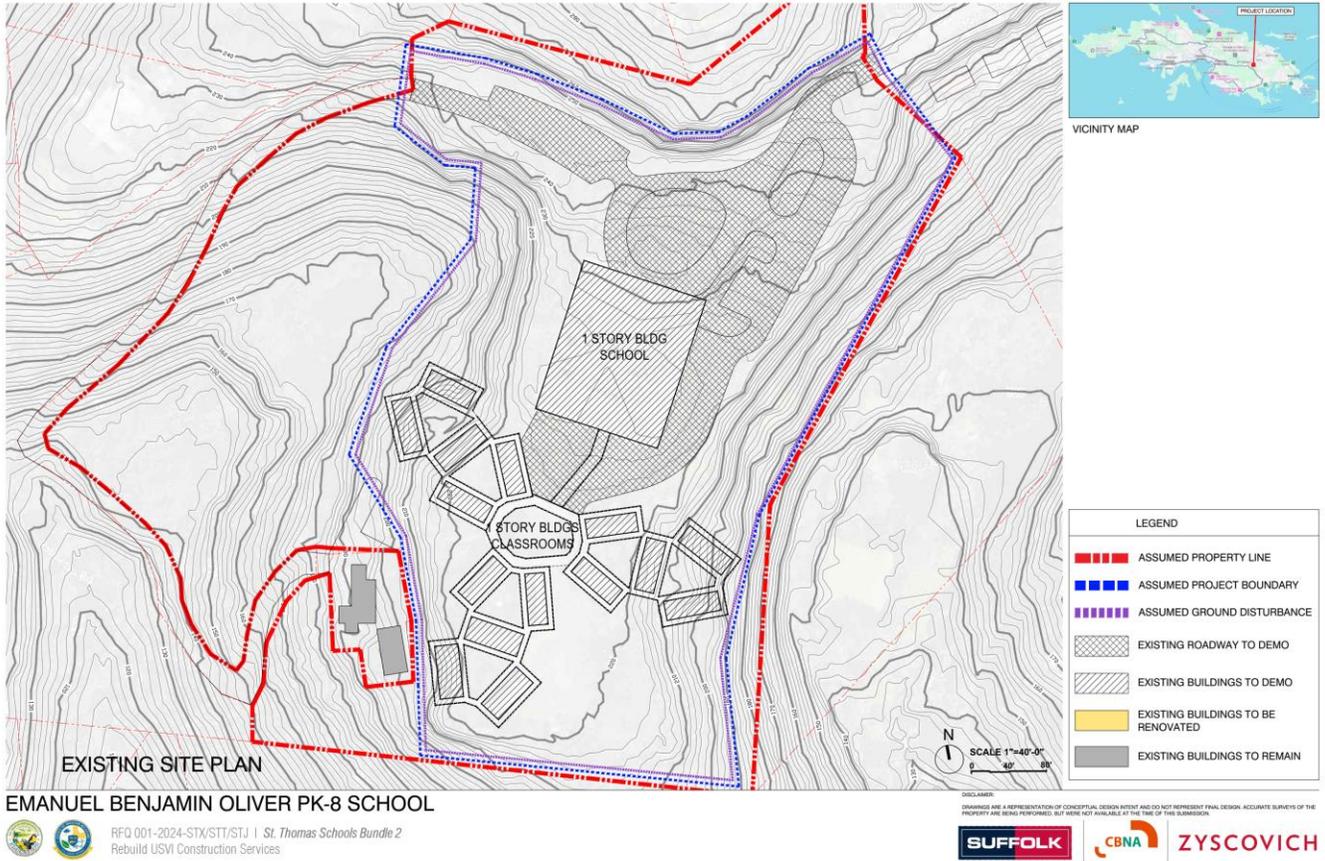


Figure 4. Existing Site Plan for Oliver PreK - 8th



Figure 5. Proposed Development Site Plan for Emanuel Benjamin Oliver PreK- 8th

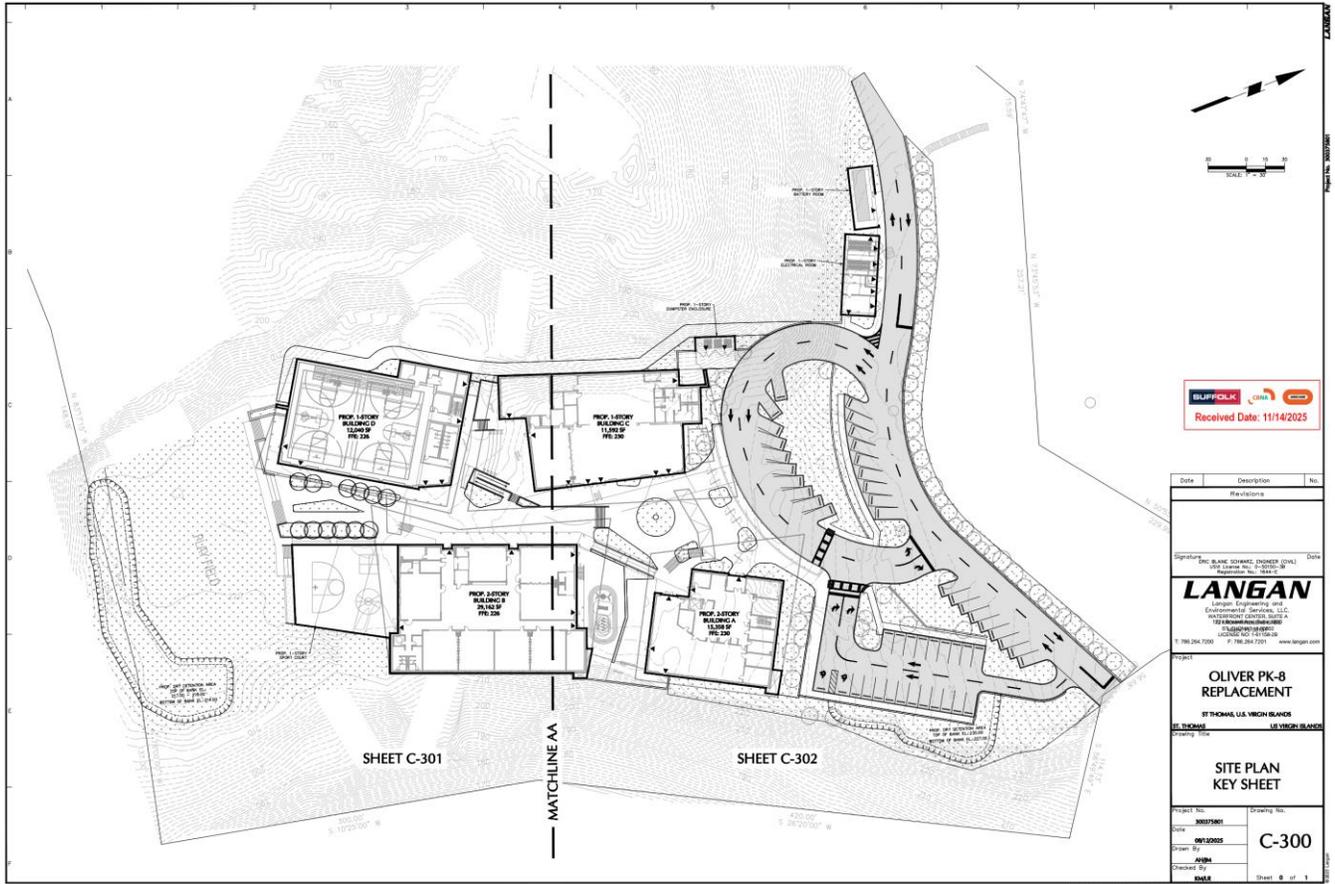


Figure 6. Civil Site Plan showing building square footage.



# ENVIRONMENTAL IMPACT

## Climate/Weather

The most representative long-term wind records were found to be those from the Cyril E. King Airport station (located approximately 5.7 miles west of the Project Area). The station contains approximately 68 years of wind data records beginning in 1953.

NOAA Station 9751639 is located closer (2.2 miles) to the project site on the West Indian Company (WICO) Dock but only has wind records dating back to the year 2000. The data indicates that the predominant winds are from the east, with 90% of the winds occurring from the southeast to northeast. Winds from the occur approximately 5% of the data record. A wind rose of the hourly wind speeds for the 1953 – 2020 time period is provided in Figure 6.

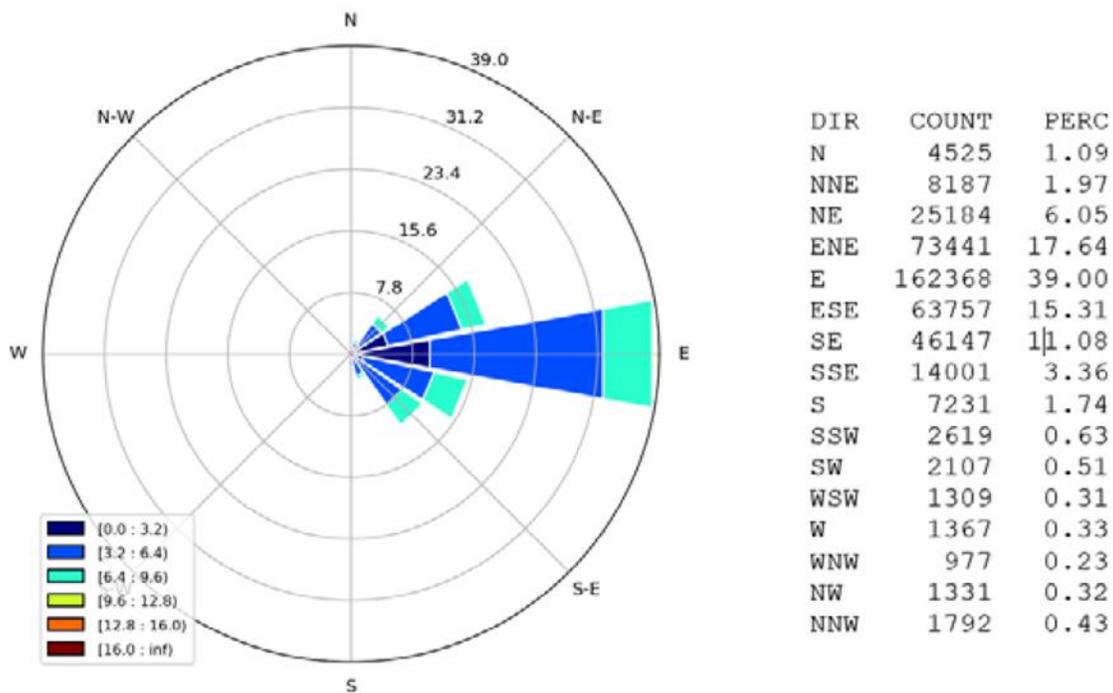


Figure 8. Hourly Wind Rose for Cyril E. King Airport, 1953-2020 (<https://weather.gov/data/obhistory/TIST.html>)

## Storm and Hurricanes

There are numerous disturbances during the year, especially squalls and thunderstorms. These occur most frequently during the summer, lasting only a few hours and causing no pronounced change in the Trade Winds.

A tropical cyclone who’s sustained (1 minute average) winds exceed 74 miles per hour is termed as a hurricane in the northern hemisphere and significantly affects the area. Hurricanes occur most frequently between August and mid-October with their peak activity occurring in September.

St. Thomas was hit by two Category V hurricanes in September of 2017, Irma on September 6th and Maria on September 19-20th. Emanuel Benjamin Oliver PreK-8 School was significantly damaged by these hurricanes and remains closed.

## Rainfall

The average annual rainfall on St. Thomas is approximately 40 inches, ranging from 35 inches toward the eastern end of the island to more than 55 inches at the higher elevations.

The Ivanna Endora Kean High School area receives around 45 inches of rainfall per year, on average. The rainfall usually occurs in brief, intense showers of less than a few tenths of an inch. February and March are the driest months, and September is the wettest, with nearly half the annual rainfall occurring between August and November. Over the last several years weather patterns have been shifting, and more intense hurricanes with greater rainfalls have been occurring.

Monthly Total Precipitation for EAST HILL, VI													
Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2000	2.68	4.82	0.25	0.45	4.98	1.12	5.06	2.53	1.74	2.41	3.34	1.25	30.63
2001	0.89	1.68	0.43	1.32	9.42	0.26	2.36	3.64	1.33	5.22	3.03	6.77	36.35
2002	1.67	1.36	0.53	1.75	0.56	0.97	1.09	2.40	1.94	1.61	1.22	3.90	19.00
2003	1.81	1.30	0.62	3.28	0.69	1.07	3.33	3.12	2.03	4.00	20.19	4.97	46.41
2004	2.44	0.63	3.74	1.81	4.68	1.54	2.55	0.88	12.13	3.66	8.40	1.67	44.13
2005	2.24	0.32	0.10	4.34	5.22	3.88	4.15	2.20	2.64	16.25	M	1.67	M
2006	2.73	0.79	1.60	M	2.39	2.84	5.02	2.26	1.60	16.24	4.81	1.30	M
2007	0.71	1.21	3.50	3.76	1.28	1.80	2.43	2.53	2.01	9.51	2.66	3.48	34.88
2008	1.58	1.70	1.08	3.91	0.26	1.67	0.72	6.07	14.73	8.72	3.45	1.36	45.25
2009	1.03	0.80	1.36	0.24	1.62	2.76	1.05	2.59	8.20	4.13	5.90	2.09	31.77
2010	3.20	0.55	1.72	M	M	M	M	M	M	M	M	1.47	M
2011	0.44	0.43	1.23	2.89	11.49	8.57	5.99	5.51	3.61	1.84	5.96	1.88	49.84
2012	2.87	1.05	3.62	1.38	5.79	0.23	1.96	2.47	2.87	3.45	4.21	1.21	31.11
2013	1.36	0.85	1.73	1.56	10.84	4.22	1.94	2.82	M	2.75	6.62	9.18	M
2014	1.08	M	M	2.98	5.36	0.96	0.72	5.91	2.41	2.35	9.26	1.14	M
2015	0.92	0.58	0.49	1.27	1.64	0.80	0.62	2.97	1.09	4.49	3.47	3.18	M
2016	0.65	2.00	M	2.78	6.52	1.27	3.21	4.12	2.87	3.74	5.39	2.98	M
2017	1.92	0.81	6.81	5.35	1.36	2.29	2.80	6.71	12.06	9.02	4.58	3.04	56.75
2018	1.88	1.53	0.53	2.09	1.70	1.07	1.62	4.74	5.92	2.30	7.31	2.01	32.70
2019	1.33	0.99	0.14	0.79	6.82	0.46	3.01	5.69	4.61	1.08	0.94	2.23	28.09
2020	3.83	1.23	3.35	1.07	1.01	1.14	2.37	3.50	5.30	6.13	4.81	1.95	35.69
2021	1.15	0.82	0.88	3.56	1.47	0.90	1.65	2.39	2.67	6.30	1.58	1.56	24.93
2022	1.25	3.79	2.88	0.57	1.12	1.09	2.96	2.48	10.82	5.66	4.35	0.98	37.95
2023	1.75	1.58	0.38	3.93	0.28	3.06	1.22	2.11	1.15	7.42	4.53	0.71	28.12
2024	1.08	2.41	0.57	7.25	8.83	4.33	2.48	8.23	5.42	5.30	13.48	2.51	61.89
2025	1.14	1.32	2.44	1.67	M	M	M	M	M	M	M	M	M
<b>Mean</b>	1.68	1.38	1.67	2.50	3.97	2.01	2.51	3.66	4.75	5.57	5.63	2.58	37.53
<b>Max</b>	3.83	4.82	6.81	7.25	11.49	8.57	5.99	8.23	14.73	16.25	20.19	9.18	61.89
	2020	2000	2017	2024	2011	2011	2011	2024	2008	2005	2003	2013	2024
<b>Min</b>	0.44	0.32	0.10	0.24	0.26	0.23	0.62	0.88	1.09	1.08	0.94	0.71	19.00
	2011	2005	2005	2009	2008	2012	2015	2004	2015	2019	2019	2023	2002

Figure 9. Rainfall data from East Hill, St. Thomas

**Summary of Monthly Normals  
 1991-2020**  
 Generated on 05/10/2025

Precipitation (in.)								
Totals		Mean Number of Days				Precipitation Probabilities Probability that precipitation will be equal to or less than the indicated amount		
Month	Means	Daily Precipitation				Monthly Precipitation vs. Probability Levels		
	Mean	>= 0.01	>= 0.10	>= 0.50	>= 1.00	0.25	0.50	0.75
01	2.57							
02	1.59							
03	1.38							
04	1.69							
05	4.17							
06	2.90							
07	2.75							
08	5.23							
09	6.37							
10	5.66							
11	6.27							
12	3.04							
Summary	43.62	0.0	0.0	0.0	0.0	0.00	0.00	0.00

Empty or blank cells indicate data is missing or insufficient occurrences to compute value

Figure 10. Rainfall data Anna's Retreat, VQIVIST0001

### Temperature

Annual temperatures average 79 degrees Fahrenheit (F), with the winter low averaging 76 degrees F. and the summer high reaching an average of 84 degrees F. Occasionally, maximum daily temperatures will exceed 90 degrees F. and minimum temperatures will drop below 70 degrees F. (NWS).

Impact of weather on Emanuel Benjamin Oliver PreK-8 School, the existing weather patterns have been considered in the design of the renovations and improvements, and the design and construction will make the school to withstand the weather events which may occur. This resiliency will minimize the disruption that significant weather events will have on the lives of Virgin Islands residents.

### Landform Geology, Soils and Historic Land Use

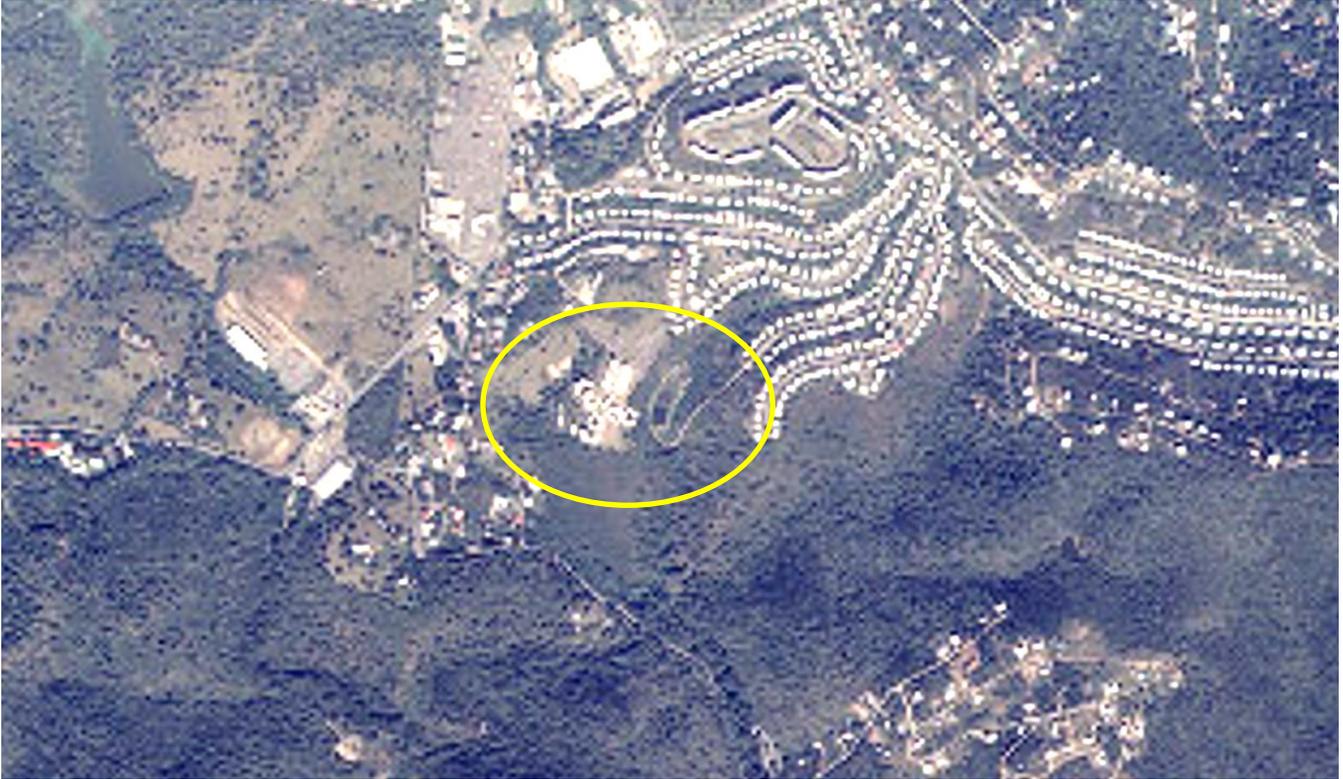
Emanuel Benjamin Oliver PreK-8 School is a developed site and as such the site has been graded and altered. The 1954 aerial service map shown below shows no development on the site. The school was built in 1975 and was designed to house 700 students.



*Figure 11. 1954 USGS Aerial Service Photograph*



*Figure 12. 1974 USGS aerial service the school has not been built*



*Figure 13. Emanuel Benjamin Oliver PreK-8 School November 29, 1988*



*Figure 14. November 25, 2017 Google Earth Aerial photograph.*

The U.S. Department of Agriculture (USDA) Custom Soil Survey identifies two soil types within the Emanuel Benjamin Oliver PreK-8 School property, Fredriksdal-Susannaberg complex, 20 to 40 percent slopes, extremely stony and Fredriksdal-Susannaberg complex, 40 to 60 percent slopes, extremely stony. These soils are not prime farmland, and they have a weathered parent material. The depth to a restrictive layer is 10 to 20 inches, where either lithic bedrock or paralithic bedrock is encountered. The depth to groundwater is more than 80 inches in this well drained soil.

Custom Soil Resource Report  
Soil Map



Figure 15. USDA Soil Survey Map

### ***Drainage, Erosion Control, and Maintenance***

The Emanuel Benjamin Oliver PreK-8 School encompasses approximately xx acres. The highest elevation is found at the entrance, and the center of the school property is level at 220ft of elevation, with some class rooms on the edge of the knoll down to 190ft of elevation. There are no well defined drainage ways within the property, and the property has been extensively graded.

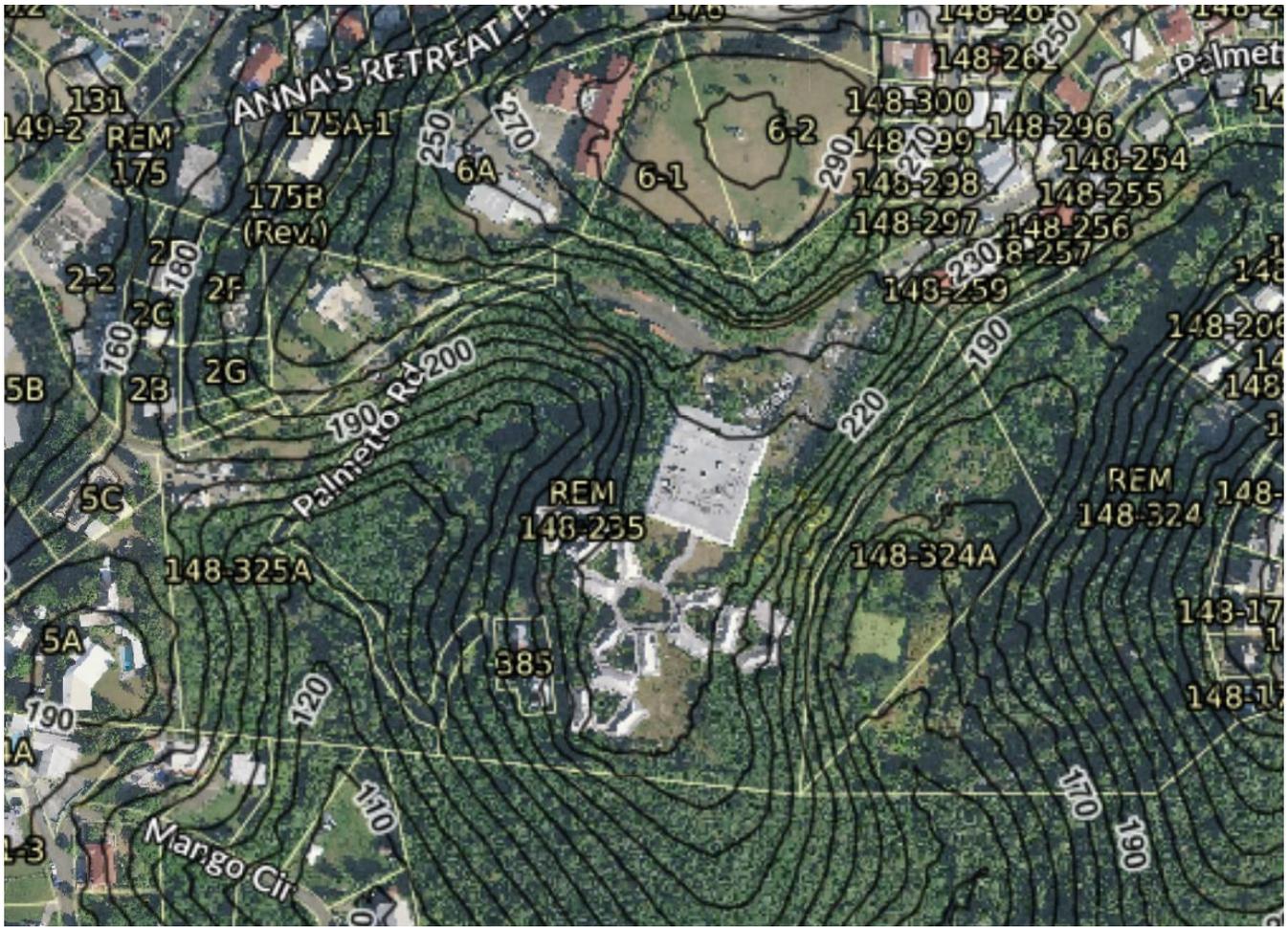


Figure 16. Topographic Map of the Emanuel Benjamin Oliver PreK-8 School

Site drainage will be handled as shown in Figure 7.

Runoff from the site both predevelopment and post development have been calculated for both the 10-year, 24-hour and 100-years, 24- hour storms as shown below.

Storm Events	Pre-Development Q (ac-ft)	Post-Development Q (ac-ft)
10-year, 24-hour	3.13	3.50
100-year, 24-hour	6.51	6.91

A 0.83 acre-ft dry detention pond is proposed which is a greater volume that the increase in discharge volume post development.

#### Drainage Patterns

The school sits on a knoll and as the existing drainage patterns are shown in Figure 17 below. Drainage will be altered to that shown in Figure 7 post construction.



Strictly enforced measures to control sedimentation and erosion will be implemented during all phases of construction to ensure that rainfall will not affect the nearby drainageways or result in erosion of soil. Due to the size of the project Suffolk-CMFA JV will be applying for coverage under the General Construction Permit.

### ***Coastal Floodplain***

According to the effective (2007) FEMA FIRM Map and the USVI Flood Hazard Advisory Map Emanuel Benjamin Oliver PreK-8 School lies in Flood Zone X where 100-yr coastal flooding is not expected during the 100-year return period flood event.

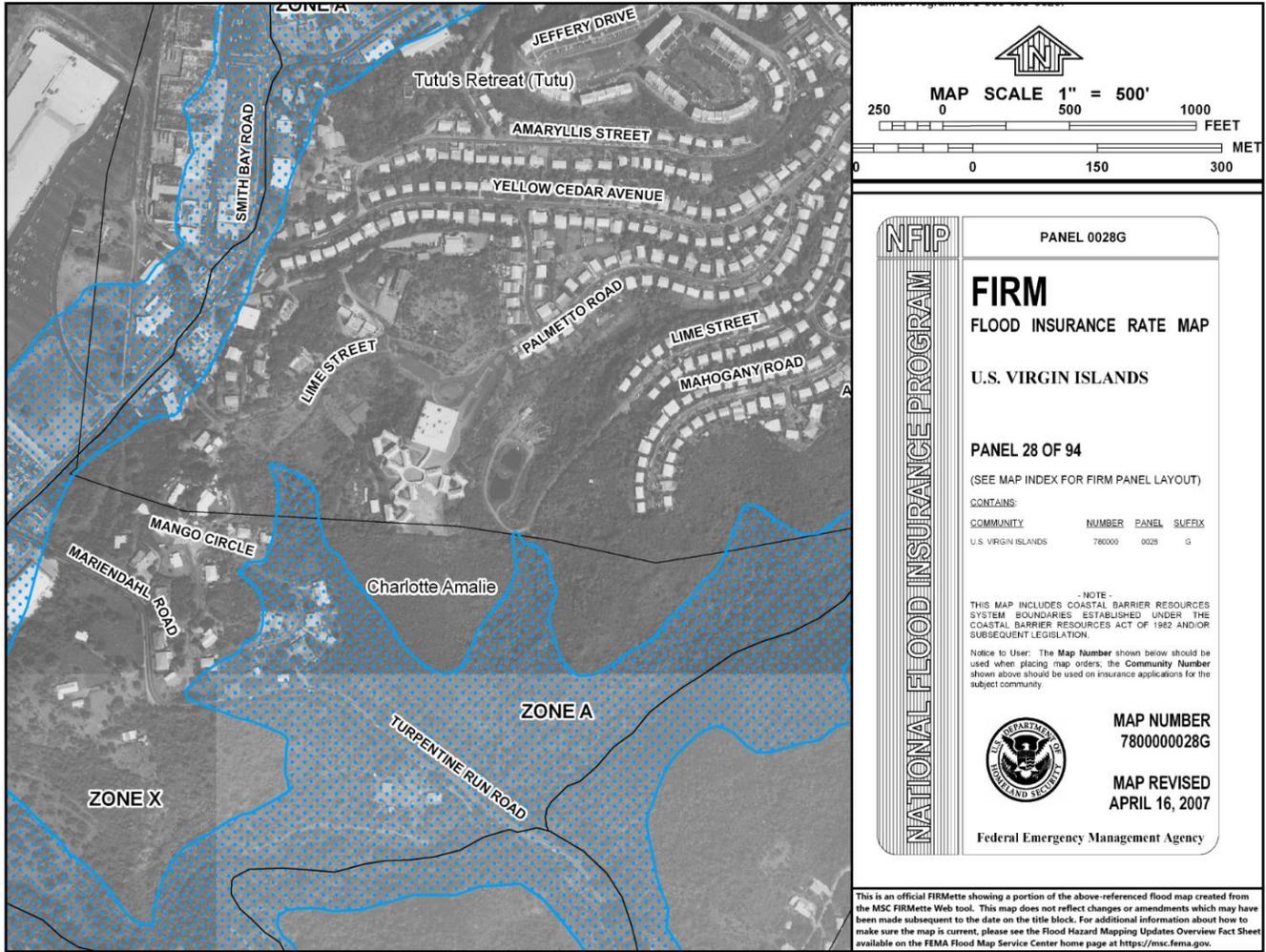


Figure 17. FEMA FIRM 28 of 94 April 16, 2007

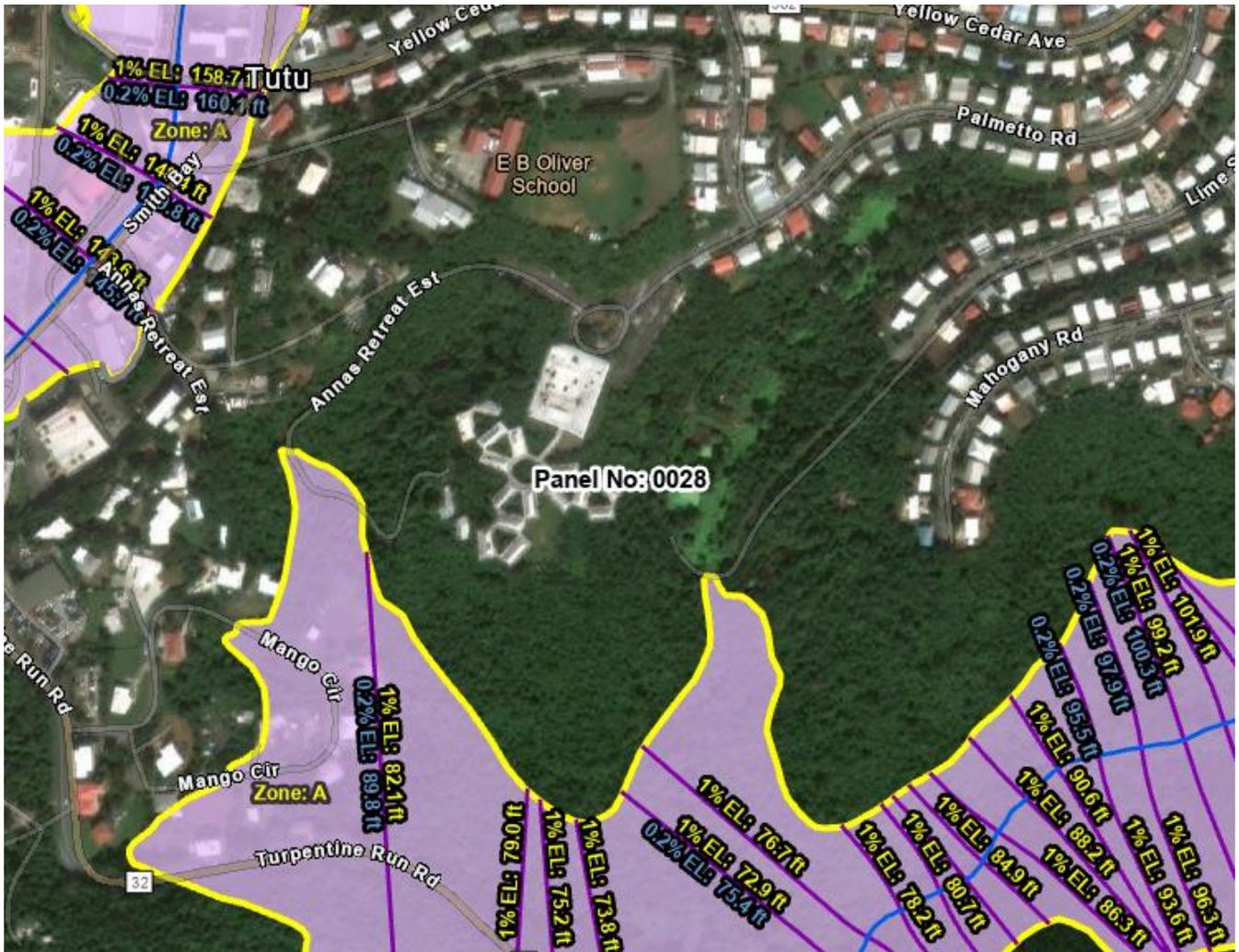


Figure 18. USVI Flood Hazard Advisory Map

### **Fresh Water Resources**

The proposed renovation/addition to the Emanuel Benjamin Oliver PreK-8 School will have no impact on freshwater resources. No freshwater ponds or streams occur within the project footprint and groundwater resources within the area are deeper than 80 inches according to the USGS Soil Survey. There are two ponds located down slope to the east of the school.

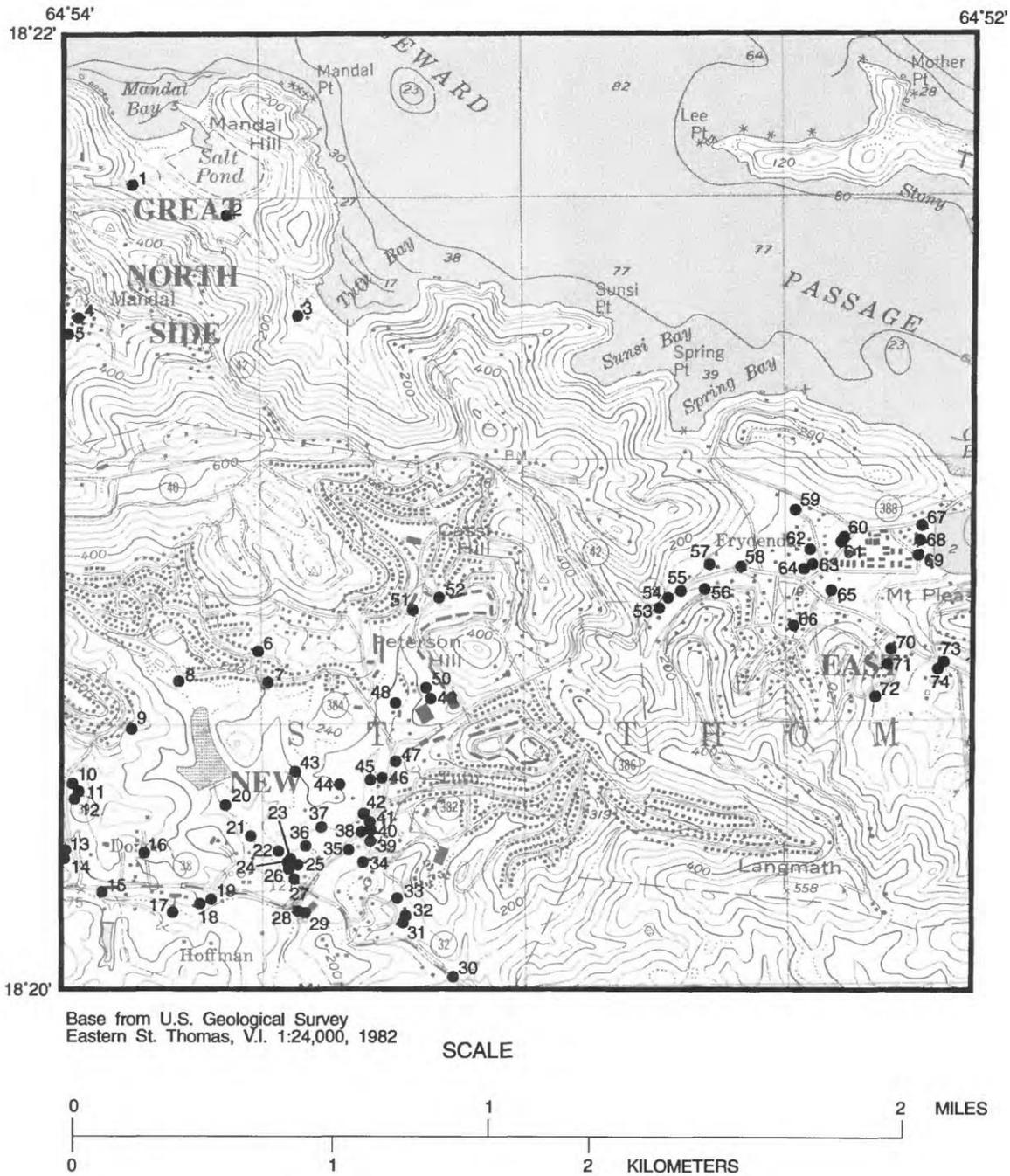


Figure 19. Wells in the vicinity of the Emanuel Benjamin Oliver PreK-8 School

There are not wells on the Emanuel Benjamin Oliver PreK-8 School.

## ***Oceanography***

The project location is inland and will not be affected by sea storm events. The project will implement strict stormwater control measures during construction and will apply for coverage under the General Stormwater Permit for construction and the required monitoring of the controls and therefore should not create sediment laden runoff which could affect water quality in the watershed of ponds down slope.

## ***Marine Resources***

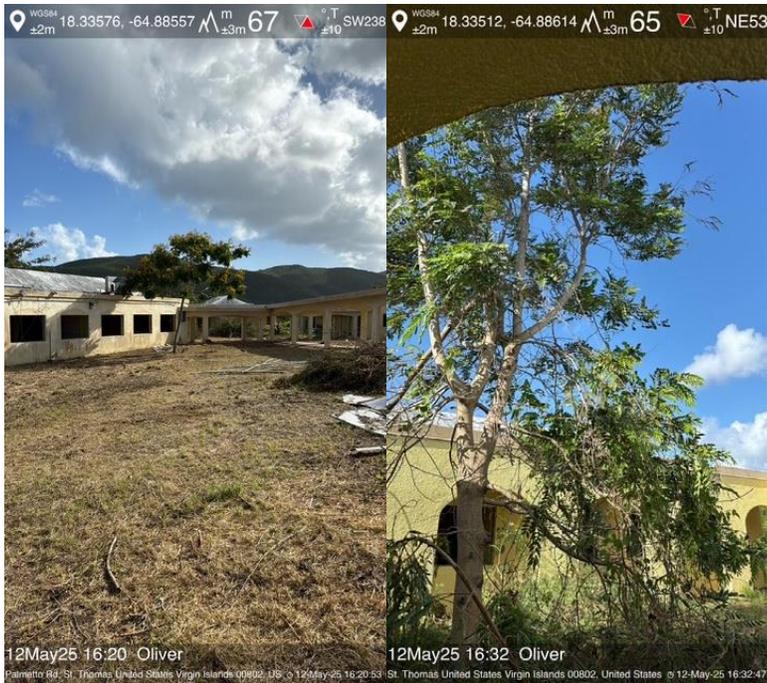
The property is located inland and will have no direct impact on the marine environment if strict sedimentation and erosion control are implemented and monitored.

## ***Terrestrial Resources***

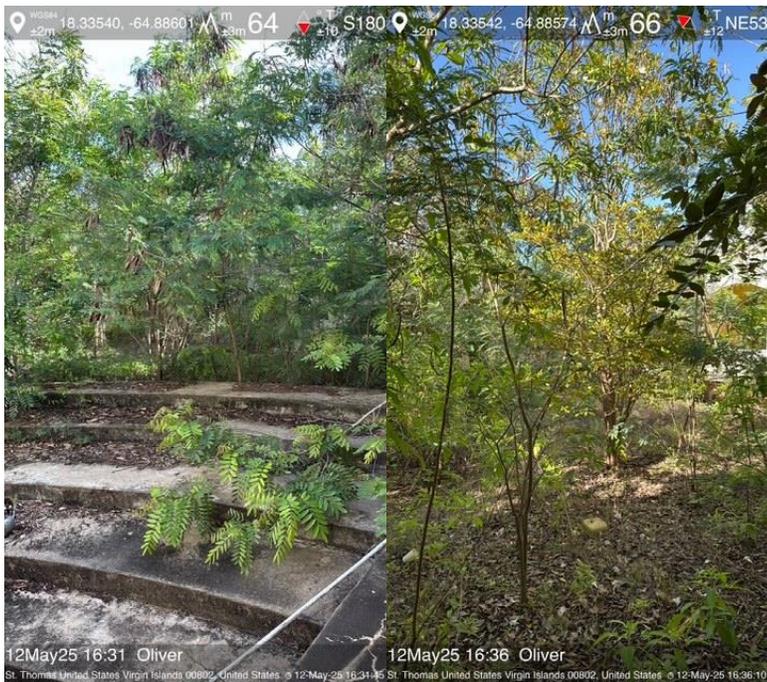
The proposed project will occur within the existing previously developed areas of Emanuel Benjamin Oliver PreK-8 School. No natural terrestrial resources or any native flora or fauna should be impacted during the renovation and modernization to Emanuel Benjamin Oliver PreK-8 School. The school has some larger trees around the property, some of which could be considered specimen trees. These have been planted as part of the landscaping or by the facility of the school. Where possible all larger trees will be preserved. The site will be landscaped with native VI species upon completion of construction.



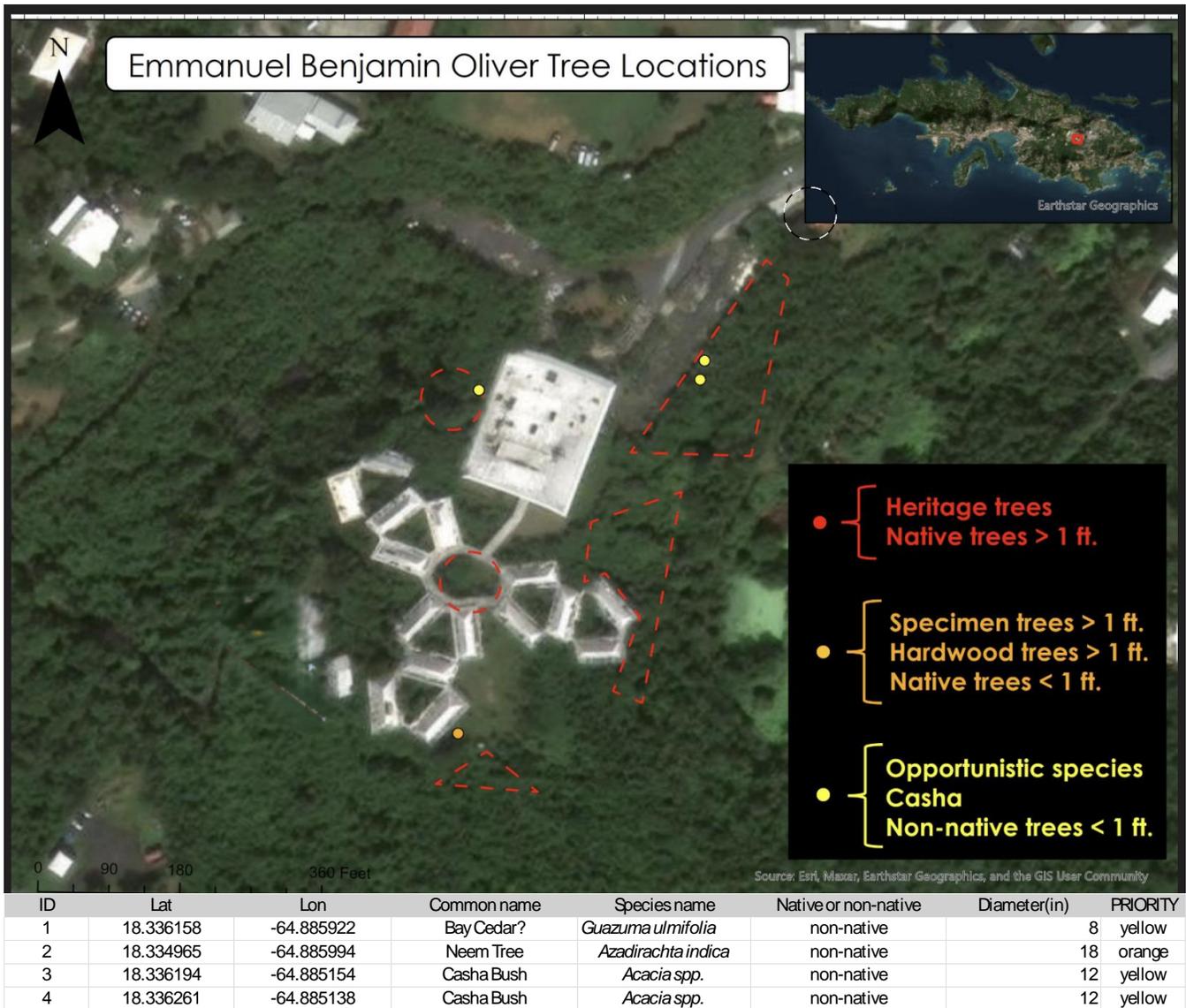
The school has become overgrown heavily since it is not in use.



There are several yellow flame trees (*Peltophorum pterocarpum*) on the property.



Secondary growth vegetation has taken over much of the school.



There are no heritage trees on the property. The large neem which is a non-native will be removed.

### 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). The Emanuel Benjamin Oliver PreK-8 School renovations will have no impact on wetlands.



May 17, 2025

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Figure 20. FWS National Wetland Inventory

### Rare and Endangered Species

Endangered or threatened species or endangered species could occur near the Emanuel Benjamin Oliver PreK-8 School. According to the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) project tool, endangered species, are expected to be found within the area of the proposed project site. The Virgin Islands Tree Boa, *Chilabothrus granti*, is listed as potentially occurring on the site. A terrestrial survey was done throughout the property, and no ESA species were noted within the developed portion of the school, but the surrounding forest could provide habitat for the Virgin Islands Tree Boa, and it is possible that a tree boa could be found on the site in the trees which are scattered about the site. Reptiles were abundant and tree anoles (*Anolis cristatellus*), grass anoles (*Anolis pulchellus*), barred anoles (*Anolis stratulus*), dwarf geckos (*Thecadactylus sp*), and common ground lizards (*Sphaerodactylus macrolepis*) were seen around the buildings and in the forested areas surrounding the site. The Virgin Islands tree boa could be present but was not seen during the survey. There is sufficient interdigitation in the surrounding forested areas and there is an adequate prey base.

Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area must be delineated so that areas not slated for construction are not impacted. A training session

should be held with the Division of Fish and Wildlife prior to the start of work and then again at the start of construction so workers can be informed about the boas and what to do if they are encountered.



Figure 21. Virgin Islands Tree Boa, *Chilabothrus granti* (FWS website)



There is adequate refugia around and on the property.



There is good interdigitation within the school property for the tree boa.

### *Air Quality*

There will be minor increases in emissions during the project due to the use of heavy construction equipment that will create combustion engine exhaust. Upon project completion, air quality will return to pre-construction conditions.

## **IMPACT ON MAN'S ENVIRONMENT**

### *Land and Water Use Plans*

The project site is zoned R-2 Residential Low Density. Secondary schools are a permit use by right in the R-2 zoning. The proposed renovation/modernization/expansion of the Emanuel Benjamin Oliver PreK-8 School will not alter the existing use and is in accordance with the laws and regulations of the U.S. Virgin Islands.

### *Visual Impacts*

The proposed renovation/modernization project will improve the visual appearance of the school and will be a positive impact on the viewshed.

### *Social and Economic Impacts*

Providing the best possible schools for Virgin Islands children is a positive social impact. Schools that are modern and provide children with safe environments and adequate space where they can thrive will help advance the Virgin Islands socially and economically.

### *Historical and Archaeological Resources*

The proposed renovation/modernization/expansion of the Emanuel Benjamin Oliver PreK-8 School project will only result in alterations to previously developed or altered areas. No undisturbed area will be affected. A clearance letter has been requested from the State Historic Preservation Office.

### *Waste Disposal and Accidental Spills*

The Virgin Islands Waste Management Authority has specific guidelines and criteria for accepting construction debris. Any excess excavated material spoils and construction debris will be collected, taken off-site, and disposed of in accordance with all governing laws and regulations.

The high school is connected to the public sewage treatment system.

## COASTAL CONSISTENCY

The renovation and modernization of Emanuel Benjamin Oliver PreK-8 School will have a negligible potential of impacting environmental resources, or ambient water quality during construction. A General Stormwater Permit for construction will be obtained by Suffolk-CBNA JV) and sedimentation and erosion control measures will be implemented during all construction to ensure that no environmental impacts occur. The proposed project will occur only within previously altered areas and if required, 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 resource of the coastal zone be consistent with the enforceable policies of a state's federally approved coastal management program. Emanuel Benjamin Oliver PreK-8 School renovations, modernization and addition, 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 Emanuel Benjamin Oliver PreK-8 School renovations, modernization and addition 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 Emanuel Benjamin Oliver PreK-8 School 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 Emanuel Benjamin Oliver PreK-8 School project is entirely within previously disturbed and developed areas. The project will not impact any natural resources and will improve the visual landscape.

**(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.**

- Emanuel Benjamin Oliver PreK-8 School is located mid inland and is the redevelopment of an existing school, the redevelopment of a brownfield site rather than a greenfield site protects the Virgin Islands' non renewable resources.

**(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.**

- Emanuel Benjamin Oliver PreK-8 School is outside the coastal area, and its redevelopment does not affect potential commercial uses in the coastal zone 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 school renovation and expansion will only occur in areas that have been previously altered. Safe modern schools are essential for a community to thrive, and the renovation and modernization of the school will help meet that goal.

**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 school renovations and expansion 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 insuring 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 shoreline consistent with constitutionally protected rights of private property owners.**

- The school renovation and expansion project will in no way affect public access to, or use of, the shoreline. The property has no waterfront and is located mid island.

**(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 school renovation and expansion 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 proposed school renovation and expansion is designed so that it impacts only previously disturbed 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 properties.

**(9) Maintain or increase coastal water quality through control of erosion, sedimentation, runoff, siltation, and sewage discharge.**

- The proposed school renovation and modernization will have no long-term change on sedimentation or erosion and will not result in discharge of wastewater into the environment. The school is tied into the public WWTP.

The project will implement sedimentation and erosion control BMPs to prevent loss of sediment from the project site.

- The proposed Emanuel Benjamin Oliver PreK-8 School renovations, modernization and addition 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 Emanuel Benjamin Oliver PreK-8 School renovations, modernization and expansion 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).