

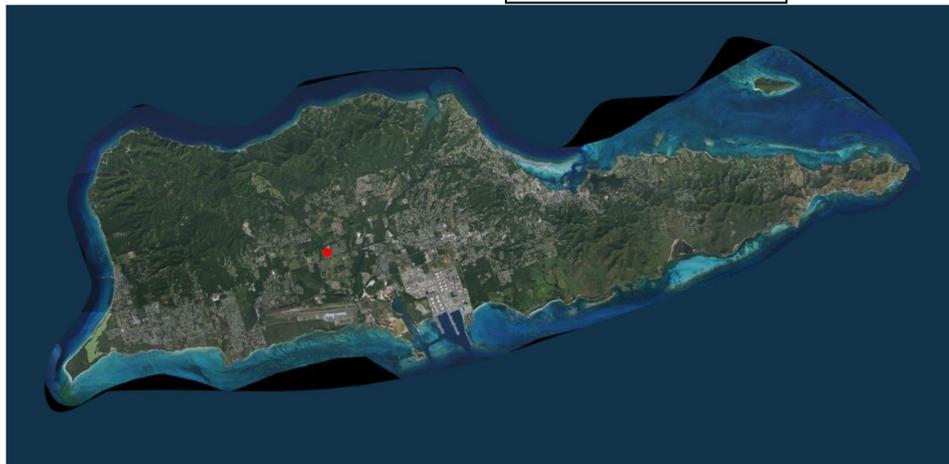
Virgin Islands Department of Education
Coastal Consistency Determination Request

Renovation/Modernization of the St. Croix Educational Complex High
School Project,
St. Croix, U.S. Virgin Islands

Grant Manager: #86987
FEMA Applicant Id: #000-U6P8U-01
June 1, 2022

The Virgin Islands Department of Education (VIDE) hereby requests your permission to undertake the FEMA funded project – **St. Croix Educational Complex High School (Complex) Renovation/Modernization Project**. The St. Croix Educational Complex High School is located at 5-A & 5-C VICORP Land, St. Croix, USVI 00851.

Project Location



USVI, St. Croix – Location Map, St. Croix Educational Complex



DESCRIPTION OF PROJECT

The St. Croix Educational Complex High School was damaged during Hurricanes Maria and Irma in September 2017. The purpose of the project is to renovate and modernize the campus to fulfill the VIDE vision outlined in the Bridging Documents, under the Federal Emergency Management Agency (FEMA) Public Assistance (PA) program, utilizing the flexibility afforded by the Bipartisan Budget Act (BBA). This property has three major buildings connected by a continuous, interconnecting exterior breezeway, ancillary buildings, a baseball field, football, and track - it is a High School for academic and CTEC classes, and is used for adult education in the evenings.

The proposed renovation/modernization program intends to re-utilize the existing building structures along with supplemental secondary new construction. The damage necessitates a roof repair, at a minimum, for Building 1. A roof replacement on Buildings 2 and 3, of the existing standing seam metal roof is also needed. Finish flooring replacement, cleaning, and repainting is proposed for all buildings.

Most of the existing buildings were not designed to utilize mechanical cooling. Classrooms are naturally ventilated through operable louvers. The louvers are damaged and, in most cases, do not open or close. The HVAC systems, where they exist, require replacement.

The existing electrical switchgears that provide the main point of power for each building are beyond their useful life. A large portion of the equipment is located outdoors, with rusting and general wear and tear readily apparent. The electrical panel boards in each of the buildings, which are in a similar state, are beyond the point of useful life. Wiring and electrical devices are beyond their useful life. Lighting fixtures are in a rough state after many years of use, and many were damaged by water intrusion and are inoperable. The existing potable water systems are damaged and exhibit leaks throughout the campus. The cisterns in Building 1 and the Building 2 cistern dedicated to fire protection are not operable.

Demolition is proposed for several ancillary existing structures along with outdoor pedestrian areas. Expansion of the current building footprint for Buildings 2 and 3 is proposed.

The scope of Building 1 is limited to repairs and improvements as required by Chapters 1 & 3 of the International Existing Building Code and Chapter 11 of the International Fire Code.

The proposed removal and replacement work for Buildings 2 and 3 includes new roofs, new doors, windows, HVAC systems, electrical, lighting, and accessible bathroom renovations. The breezeway at Building 2 will be enclosed. HMP scope of work, proposed hazard mitigation, for Buildings 2 & 3 will strengthen the buildings' seismic and wind loads to Risk Category 3 and help prevent extensive damage to the facility in the future. Replacement of cabinetry, plumbing, kitchen fixtures, broken windows, and exterior/interior doors is required. Open areas without a finished ceiling need repainting after roof replacements. Drywall or lay-in ceilings in offices, classrooms, restrooms, and kitchens must be replaced due to heavy mold and water damage.



USVI, St. Croix – Current Structures, St. Croix Educational Complex

ENVIRONMENTAL IMPACTS

Climate/Weather

Once completed, the renovation/modernization of the St. Croix Educational Complex High School will not be affected by climate or weather. During selected demolition, rainfall will influence the open areas created by the demolition. Sedimentation and erosion controls will be implemented to ensure that rainfall will not affect the nearby drainage way during demolition.

Prevailing Winds

The Virgin Islands lie in the "Easterlies" or "Trade Winds" which traverse the southern part of the "Bermuda High" pressure area, thus the predominant winds are usually from the east-northeast and east.

Precipitation

The average annual precipitation on St. Croix is approximately 37 to 43 inches. Rainfall usually occurs in brief, intense showers of less than a few tenths of an inch, and major rainfall events are associated with weather systems. The Virgin Islands have no sharply defined wet seasons. The wettest period generally is from August to November, and the driest period is from January to April.

Landform Geology, Soils, and Historic Land Use

The soil composition of the area of the St. Croix Educational Complex High School Project site is Sion Clay SiA 0% to 2% slopes Sion Clay SiB-2% to 5% slopes. All work is being done in areas that have already been disturbed.

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.

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
S1A	Ston clay, 0 to 2 percent slopes	3.3	4.1%
S1B	Ston clay, 2 to 5 percent slopes	76.2	95.9%
Total for Area of Interest		79.6	100.0%

St. Croix Educational Complex High School Web Soil Survey map showing soils in the vicinity of the APE.



Historic Land Use

The land that now houses the St. Croix Educational Complex has a history of land use that includes agriculture and estate ownership, as well as its more recent use for education. Historically, the area was part of large estates used for agriculture and later developed as a school site.

Drainage, Erosion Control, and Maintenance

Refer to policy (9)

Erosion control measures will be accomplished with perimeter controls such as silt fencing, grade stabilization, weekly site maintenance, and erosion control blankets. Sediment track-out will be mitigated with gravel entrances.

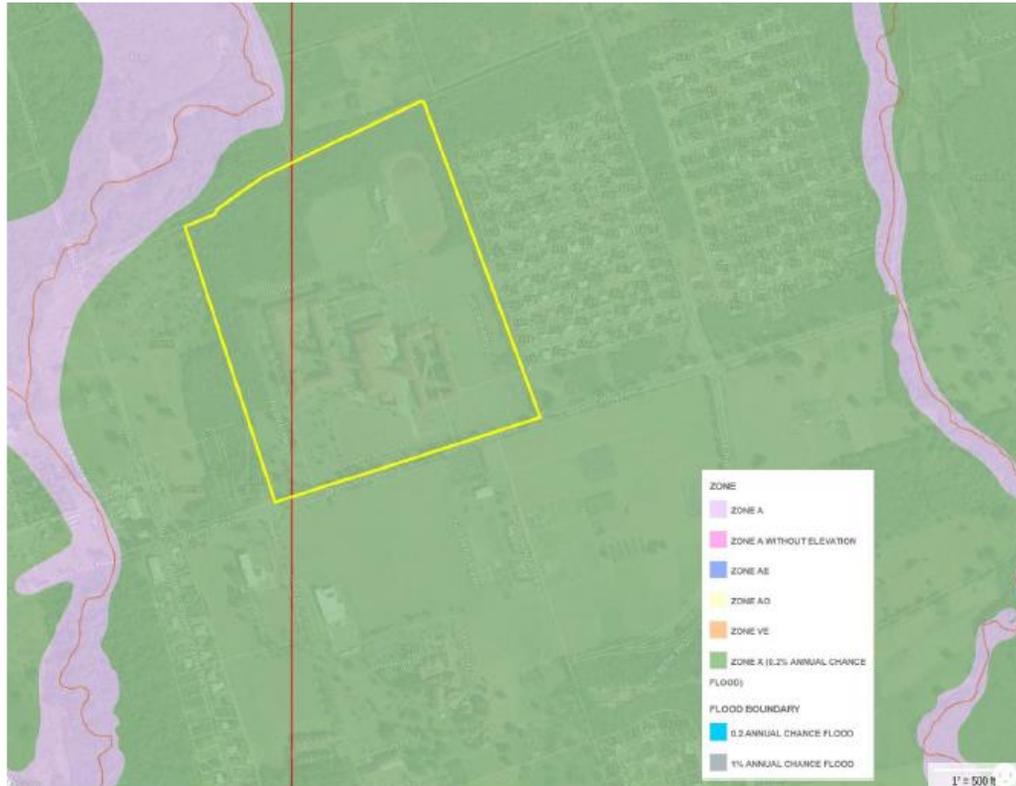
Drainage will be controlled by using tools such as vegetative swales.

Drainage Patterns

The proposed project will have no impact on existing drainage patterns.

Coastal Floodplain

The project is not located in a coastal flood plain. Sediment and erosion controls will be implemented in this area and any materials that need to be stockpiled overnight will be properly stored so as not to be susceptible to run off.



- FEMA flood zone X
- No Pre-Existing flood conditions exist
- The site is not within a 100 year flood zone

Fresh Water Resources

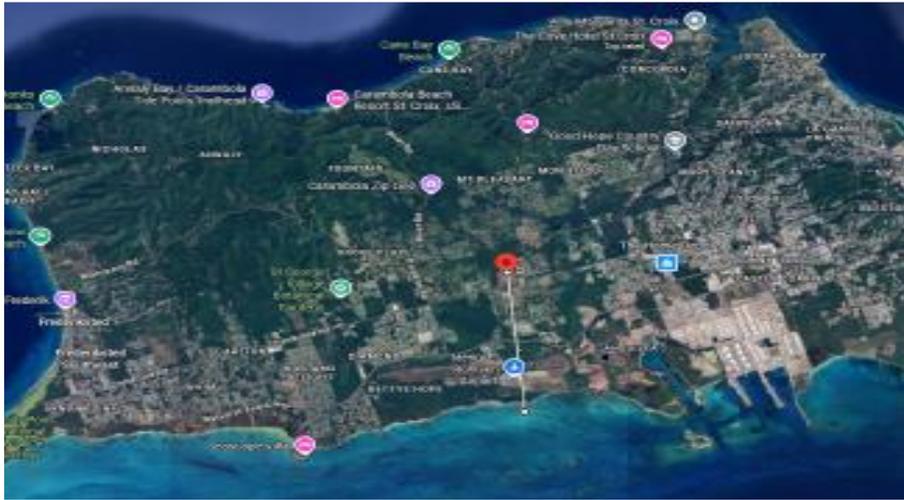
The St. Croix Educational Complex High School project will have no impact on freshwater resources. No freshwater ponds or streams occur within the project footprint, and groundwater resources in the area are deeper than 80 inches, meaning they are below the proposed project's depth.

Oceanography

The project location is inland and should not be affected by sea storm events. The project will implement strict storm water control measures during construction and will apply for coverage under the General Storm Water Permit for construction and the required monitoring of the controls, thereby ensuring that sediment-laden runoff is not generated, which could affect water quality in the watershed.

Marine Resources

The property is located inland and will have no direct impact on the marine environment, strict sedimentation and erosion controls will be implemented and monitored. The Campus is about 2.28 miles from the closest shoreline.



Terrestrial Resources

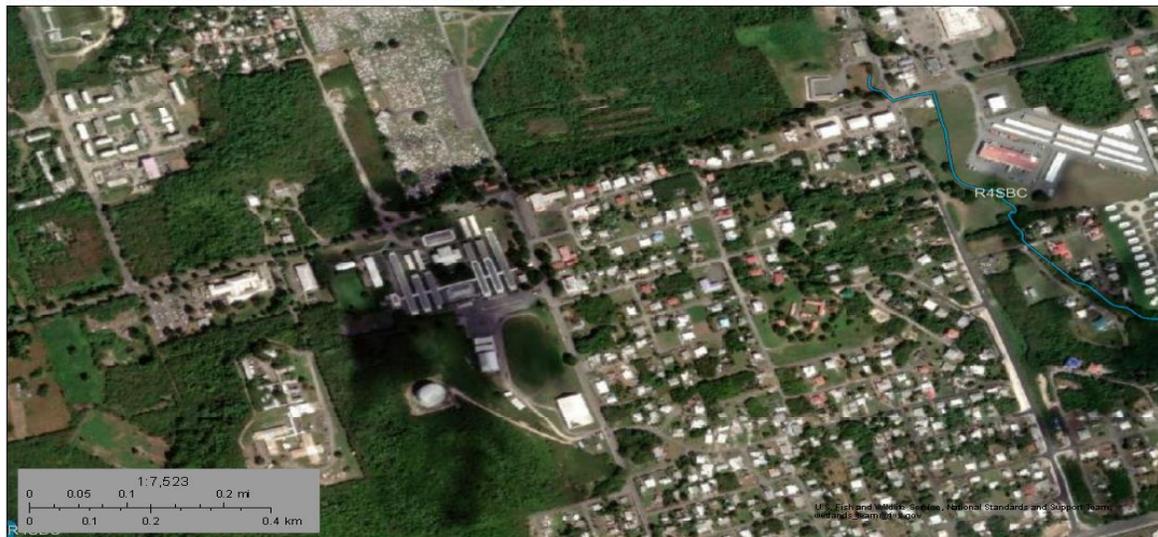
The proposed project will occur within existing previously developed areas. No natural terrestrial resources or any native flora or fauna will be impacted during the Renovation/Modernization of the St. Croix Educational Complex High School.

Wetlands

The project will have no impact on wetlands, as there are no wetlands in or adjacent to the proposed project site.



St. Croix Educational Complex



November 18, 2025

Wetlands

- | | | |
|--------------------------------|-----------------------------------|----------|
| Estuarine and Marine Deepwater | Freshwater Emergent Wetland | Lake |
| Estuarine and Marine Wetland | Freshwater Forested/Shrub Wetland | Other |
| | Freshwater Pond | Riverine |

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.

National Wetlands Inventory (NWI)
This page was produced by the NWI Mapper

Rare and Endangered Species

No endangered or threatened species or endangered species habitat exists within the proposed project site. According to the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) project tool, no endangered species, critical habitat, or migratory birds are expected to be found within the proposed project site area.

There is an endangered ground lizard (*Ameiva polops*) found on the island of St. Croix, but this lizard is only found on Buck Island, Green Cay, Ruth Cay and Protestant Cay, locations outside of the proposed project site.

There are also three endangered plant species located on St. Croix (*Agave eggersiana*, *Buxus vahlii* and *Catesbaea melanocarpa*), but these are primarily located in exposed, dry areas

- Five (5) known populations of *Agave Eggersianai* on St. Croix, all are well removed from the proposed project site.

- Three (3) known populations of *Buxus Vahlii* on St. Croix and all are well removed from the proposed project site.

- One (1) known population of *Catesbaea Melanocarpa* on St. Croix and it is also located outside the proposed project site.

Neither the endangered ground lizard nor any of the endangered plants species are found within the proposed project footprint.

Air Quality

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

There will be minor increases in emissions during the selected demolition phase due to the use of heavy construction equipment, which will generate 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 A-1 (Agricultural), which renders the property for secondary school nonconforming use and is subject to restrictions in accordance with Virgin Islands Code, Title 29, Chapter 3, Subchapter 1, §Section 234 Nonconforming. New construction will require rezoning the property to P-Public for zoning conformity.

VIDE is petitioning to rezone the property to P-Public for the long-term viability of the St. Croix Educational Complex.

Visual Impacts

The proposed project will renovate and modernize the St. Croix Educational Complex High School. The project will thereby improve the visual appearance of the area. As a result, this project will have a positive impact on the existing landscape.

Historical and Archaeological Resources

The project only involves previously impacted areas that have already been developed. There are no known historical or archeological resources.

The proposed activity complies with Tier I Programmatic Allowance B.1; and Tier II Programmatic Allowances A.2.a.; A.2.b. as identified in Appendix B of the Virgin Islands Programmatic Agreement executed on July 14, 2016. This determination was made by Marjorie Drew, who meets the applicable SOI staff qualifications pursuant to Stipulation I.B.1.a of the Agreement. The facility(s) was constructed in years 1994 & 1995 (source: Applicant and USGS Topo view map). - mdrew1 - 12/05/2022 18:58:16GMT

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, however we anticipate any cut earth will be used onsite as fill to for new building pads.

Expected materials on the project site that may require spill containment include vehicle fluids (oil, gasoline, diesel, hydraulic fluid) and human waste (contained in “Port-O-Potty” type facilities). The Contractor will follow standard procedures when handling such materials. Should a spill occur, the Contractor will immediately overexcavate the soils around the spill and dispose of the contaminated soils in an approved facility. Vehicles will be fueled off-site. In some cases, small amounts of fuel in approved five-gallon containers will be stored on-site for refueling small equipment. The contractor will be responsible for keeping all equipment in good operational condition during the proposed project timeline.

The chosen demolition contractor must be certified in the procedures for handling, containing, and disposing of hazardous materials identified from the demolition project (Asbestos and Lead Paint). The handling and disposal of hazardous materials must comply strictly with all applicable laws, regulations, and the approved abatement plan.

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 **St. Croix Educational Complex High School Project** meets each of the basic goals of the USVI for its coastal zone 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.

Comment: - The project site is not located in the Tier 1 coastal zone. However, the proposed construction work will be conducted in accordance with all required permits. During construction site operations, will be carried out with minimal impact to the environment and in conformance with best management practices.

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.

Comment: The project site is located outside the Tier 1 coastal zone. The VIDE project is a repair-and-replacement renovation of an existing VIDE facility. Proposed land disturbance will be managed to reduce soil impact and limit runoff beyond the site boundaries. Renewables, such as solar panels, are proposed to reduce the need for additional site power. A much-needed public educational facility will be repaired and improved, providing updated educational programs, learning spaces, and supporting facilities, including a safe room.

Site operations will be regulated to minimize human impacts.

3. Assure priority for coastal-dependent development over other development in the coastal zone by reserving areas suitable for commercial uses including hotels related facilities, industrial uses including port and marine facilities, and recreation use.

Comment: The project is not located in the Tier 1 coastal zone. The project is centrally located on the island, in Estate VICORP LAND, situated away from coastal hazards. The buildings and site are located outside mapped flood hazards.

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.

Comment: The St. Croix Educational Complex is an existing facility in need of repair. The site is already connected to public water, sewer, and power but the project proposed to supplement these resources through a new solar panel array and updated cisterns. The proposed building repairs and site improvements will provide the community with an upgraded facility that can withstand future natural hazards while providing contemporary learning spaces for the residents of St. Croix.

5. Preserve, protect, and maintain the trust lands and other submerged and filled lands of The United States Virgin Islands to promote the general welfare of the people of the United States Virgin Islands.

Comment: No work is proposed on trust, or submerged and filled lands.

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.

Comment: The existing Educational Complex, located in Estate VICORP Land, will be repaired with the expansion of the building footprint and site disturbance. All measures will be taken in accordance with the project's SWPP to minimize soil loss and runoff. The site is not located within the Tier 1 coastal zone.

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.

Comment: The project site will utilize an existing facility located in Estate VICORP Land, on the north side of Queen Mary Highway, therefore leaving existing and future coastal sites for public recreation and conservation initiatives.

8. Conserve ecologically significant resource areas for their contribution to the 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.

Comment: - No Environmental Assessment has been prepared for this project. However, in accordance with the Record of Environmental Consideration dated 1/3/23, the site is not located in a Coastal Barrier Resources unit, a wetland, or an essential fish habitat. The project does not modify or affect a waterway/body of water or a wild and scenic river. The project is located within a flyway zone, but it does not have the potential to take migratory birds

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

Comment: Best management practices will be in place during construction to protect water quality and comply with USVI regulations. Post-construction controls will also be in place to accommodate the increased impervious coverage due to the expansion and construction of new buildings. The site is currently connected and will remain connected to the public sewer.

10. Consolidate the existing regulatory controls applicable to use of land and water in the coastal zone into a single unified process consistent with the provisions of this chapter, and coordinate therewith the various regulatory requirements of the United State Government;

Comment:

This project is funded through the FEMA, Public Assistance Grant, which uses Federal dollars, and therefore requires compliance with the Coastal Zone Management Act and is subject to a Federal Consistency Determination review process.

Along with this Federal Consistency Determination administered by the US Virgin Islands DPNR, Coastal Zone Management, the VIDE will renovate this facility in accordance with the Clean Air Act, National Historic Preservation Act (as may be required), Coastal Zone Management Act, and the Resource Conservation and Recovery Act, and all US Virgin Islands laws, regulations, and policies consistent with these Federal programs, most notably Virgin Islands Code Title Twelve Conservation, Chapter 21 § 903 (b).

11. Promote public participation in decisions affecting coastal planning conservation and development.

Comment:

The Federal Consistency Determination requires a public hearing and comment period. This project will go through the Federal Consistency Review process, including Pre-application review, which was held on October 7, 2025, and, if applicable, final Federal Consistency determination.

I. An assessment relating to the probable effects of the proposed activity and its associated facilities on the VICZMP.

Comment: The project will comply with applicable US Virgin Islands and Federal regulations per the FEMA Record of Environmental Consideration (REC) version 3. The activity meets the exemption outlined in 12 VIC 910 (b). Other relevant laws and environmental regulations include an RCRA-compliant disposal permit and approval letter for proper handling and removal of hazardous materials and disaster-generated debris. Asbestos-containing materials have been detected. Remediation will follow all handling and disposal regulations.

Thank you for your careful consideration of this request for Consistency Determination.