Virgin Islands Department of Education
Coastal Consistency Determination Request

Lockhart PreK-8th School
Renovation/Modernization Project, St. Thomas, U.S. Virgin Islands
Grant Manager: #242933
FEMA Applicant Id: #000-U6P8U-00
June 1, 2022

The Virgin Islands Department of Education (VIDE) hereby requests your permission to undertake the FEMA funded project – **Lockhart PreK-8th School Renovation/Modernization/New Addition Projects**. The Lockhart PreK-8th School is located at #41 Estate Thomas, St. Thomas, VI 00802, Coordinates: 18.34175,-64.91670

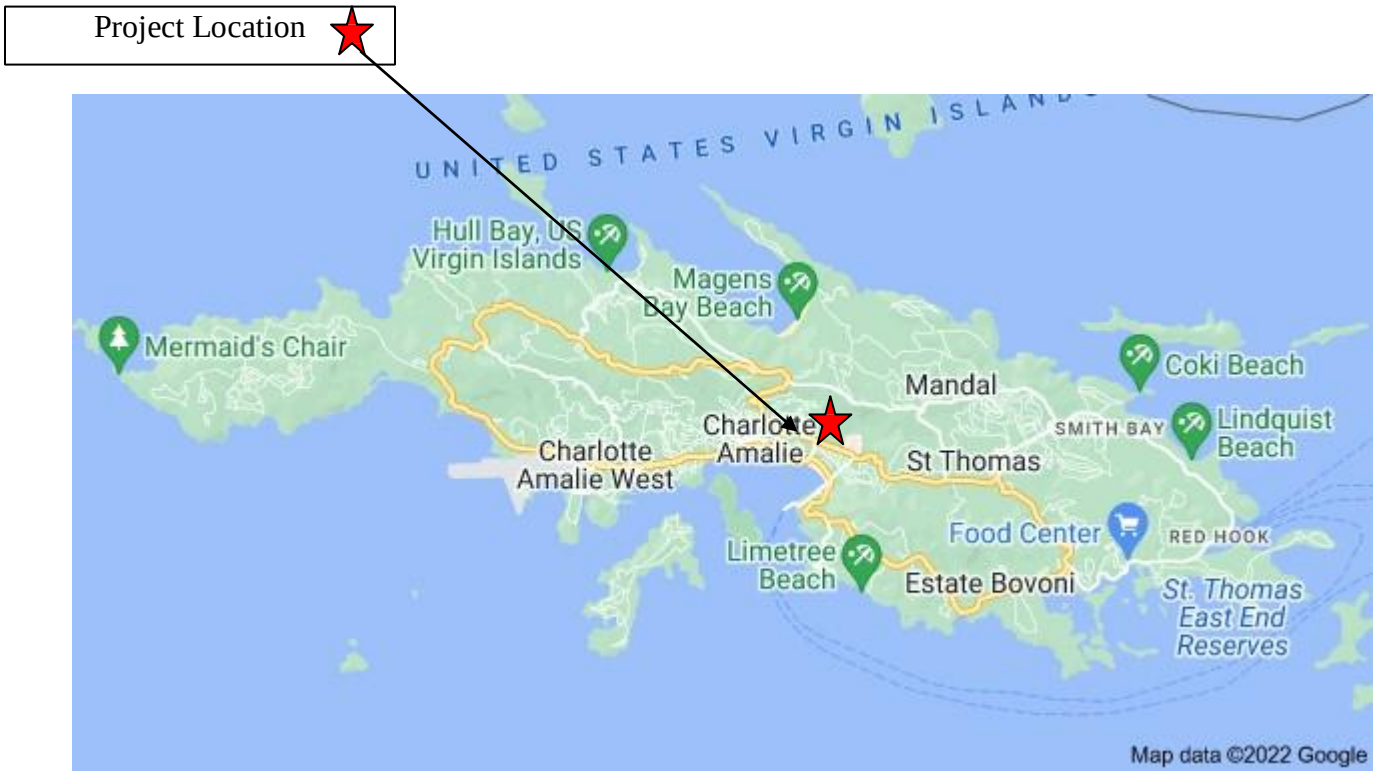


Figure 1 – USVI, St

DESCRIPTION OF PROJECT

The Lockhart PreK-8th School was damaged during the 2017 Hurricane Irma and Maria events and deemed unsafe for students and faculty. The Lockhart PreK-8th School has been assessed and approved for renovation/modernization and new additional buildings by FEMA.

The purpose of the project is to redesign, renovate/modernize and add new building to accommodate a PreK-8th School.

The purpose of the project is to design and construct a renovated and modernized school – The Lockhart PreK-8th School, to including existing classrooms, new PreK-8th classrooms, administrative offices, library, cafeteria, kitchen, bathrooms, stairways, balconies, theater, hallways and all fixtures, equipment and contents 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).

VIDE Response: the project will obtain the required permits; seek and comply with the Division of Fish and Wildlife recommendations; the VISHPO concurred and the FEMA's determination of No Historic Properties Affected pursuant to 36 CFR 800.4(d)(1). *(attached 1)* Detailed analysis that the project and its effects are consistent with the goals and policies of the VI Coastal Zone Management Program (VICZMP):

VIDE Response:

The Lockhart PreK-8th School was damaged during the 2017 Hurricane Irma and Maria events and was deemed unsafe for students and faculty. The Lockhart PreK-8th School has been assessed and deemed to be renovated/modernized.

The VIDE kindly seeks your review and approval for the required Consistency Determination certification process in accordance with the Virgin Islands Coastal Zone Management Program CZMP as required under the

VI Code Section 1, VIR and Regs. Title 12, Subchapter 904, section 904-8. This project may include the security fencing, traffic control, dust control, minimal ground disturbance, air monitoring, on the ROWSC Campus. Pre-Application meeting was held on June 7, 2022.

ENVIRONMENTAL IMPACTS

Climate/Weather

Once completed, the renovation/modernization of the Lockhart PreK-8th School will not be affected by climate or weather. Sedimentation and erosion controls will be implemented to ensure rainfall will not affect the nearby drainage way.

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. Thomas is approximately 17.87 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 June.

Landform Geology, Soils and Historic Land Use

The soil composition of the area of the Lockhart PreK-8th School Demolition Project site is:

Typical profile

- *H1 - 0 to 6 inches:* variable

Interpretive groups

- *Land capability classification (irrigated):* None specified
- *Land capability classification (nonirrigated):* 8s
- *Hydric soil rating:* No

Lockhart PreK-8th School Web Soil Survey map showing soils in the vicinity of the project Figure 1.

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
UbD	Urban land	11.3	100.0%
Totals for Area of Interest		11.3	100.0%

Drainage, Erosion Control, and Maintenance

The existing approximately 8.0-acre Lockhart Elementary School site is located at west of Ariel Melchoir Junior Drive in Charlotte Amalie, St Thomas, USVI. The single-story building is planned to be renovated however it is keeping the same existing floor plan. The south portion of the property is going to be demolished and new buildings for the campus with be built.

The overall topography of the existing site ranges from approximately 80 feet at the northwest corner of the property down to an elevation of approximately 40 feet along the southern property line by the proposed Charlotte Amalie High School parking lot. The existing school building has a fi finished floor elevation of approximately 48 ft. Given the existing topography of the site, rainfall-runoff flows from northwest to the southwest and discharges at one location. There are no existing storm water facilities to attenuate the peak runoff or store rainfall. There appears to be a drainage swale between the elementary and high school that flows southwest down to Alton Adams Sr. Drive.

Onsite drainage will be managed with inlets and pipes that will convey the runoff from the design storm directly into the drainage easement ghut along the west of the parcel. Erosion control will be managed by reducing steep slopes that could lead to concentrated flows. In addition, vegetation will be planted in open areas to prevent sediment from being exposed

Guidance on the design and proper use of Erosion Prevention BMPs located in the Virgin Islands Environmental Protection Handbook, 2002 will be used.

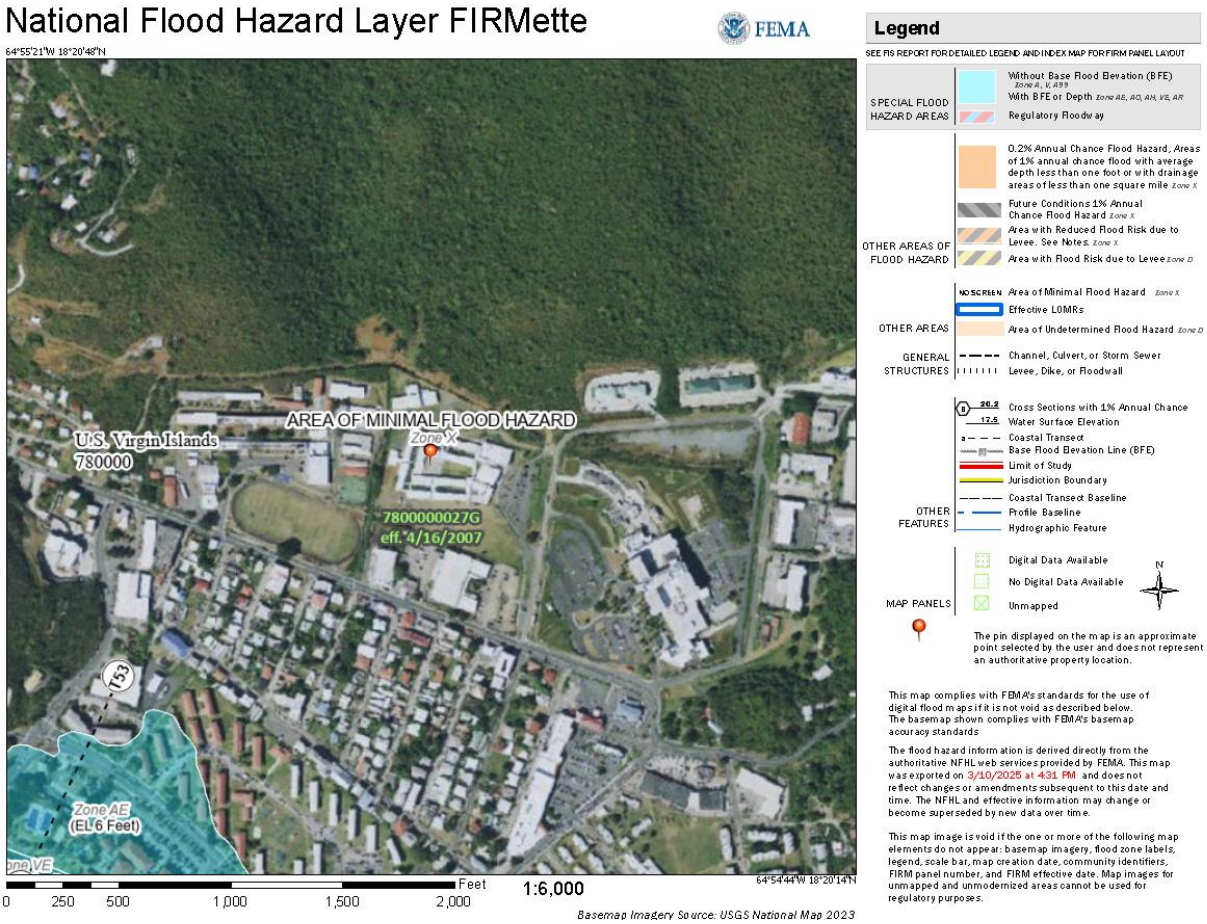
Drainage Patterns

The hydrology and hydraulics design has two primary objectives: to effectively convey water off of paved surfaces and away from buildings such that their use is not impacted during heavy rains and to attempt to minimize site runoff to no more than the volume generated by the existing site conditions. To support this, we will prepare a drainage layout identifying major features of buried and surface drainage, such as pipes, inlets, utility holes, swales, and culverts. The drainage layout will be used to create a site hydraulic model which will allow us to verify rough sizing for drainage features, as well as estimate the increased volume of runoff for the design storm due to increased impervious surfaces. Because the site has a limited amount of space available for retention features, we will size an exfiltration retention system which can be installed either underneath the proposed parking lot or sports field. The TR-55 method will be used for estimating the design storm runoff volumes and fl ow rates, per the requirements in the TPDES and SWPPP.

Existing drainage patterns will not be changed from the existing to proposed school site. The site slopes from a high point of 80-ft at the north down to 30-ft at the south.

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.



Fresh Water Resources

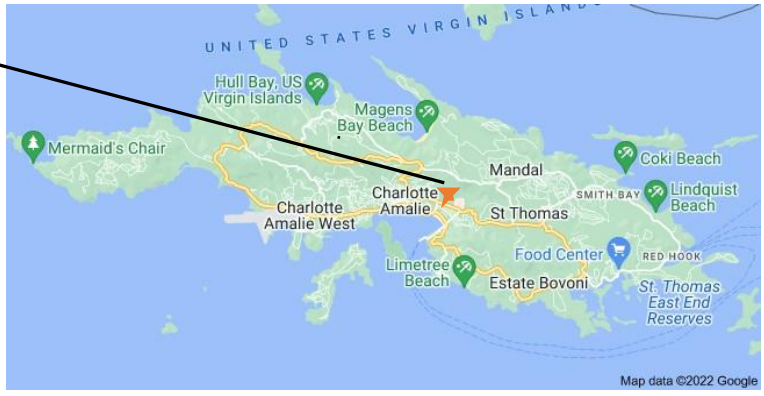
The proposed renovation/modernization of the Lockhart PreK-8th School will have no impact on freshwater resources. No freshwater ponds or streams occur within the project footprint and groundwater resources within the area are deeper than 80 inches; meaning below the depth of the proposed project.

Oceanography The proposed project occurs well inland and will not be affected by sea storm events.

Marine Resources

The property is located inland and will have no direct impact on the marine environment.

Location

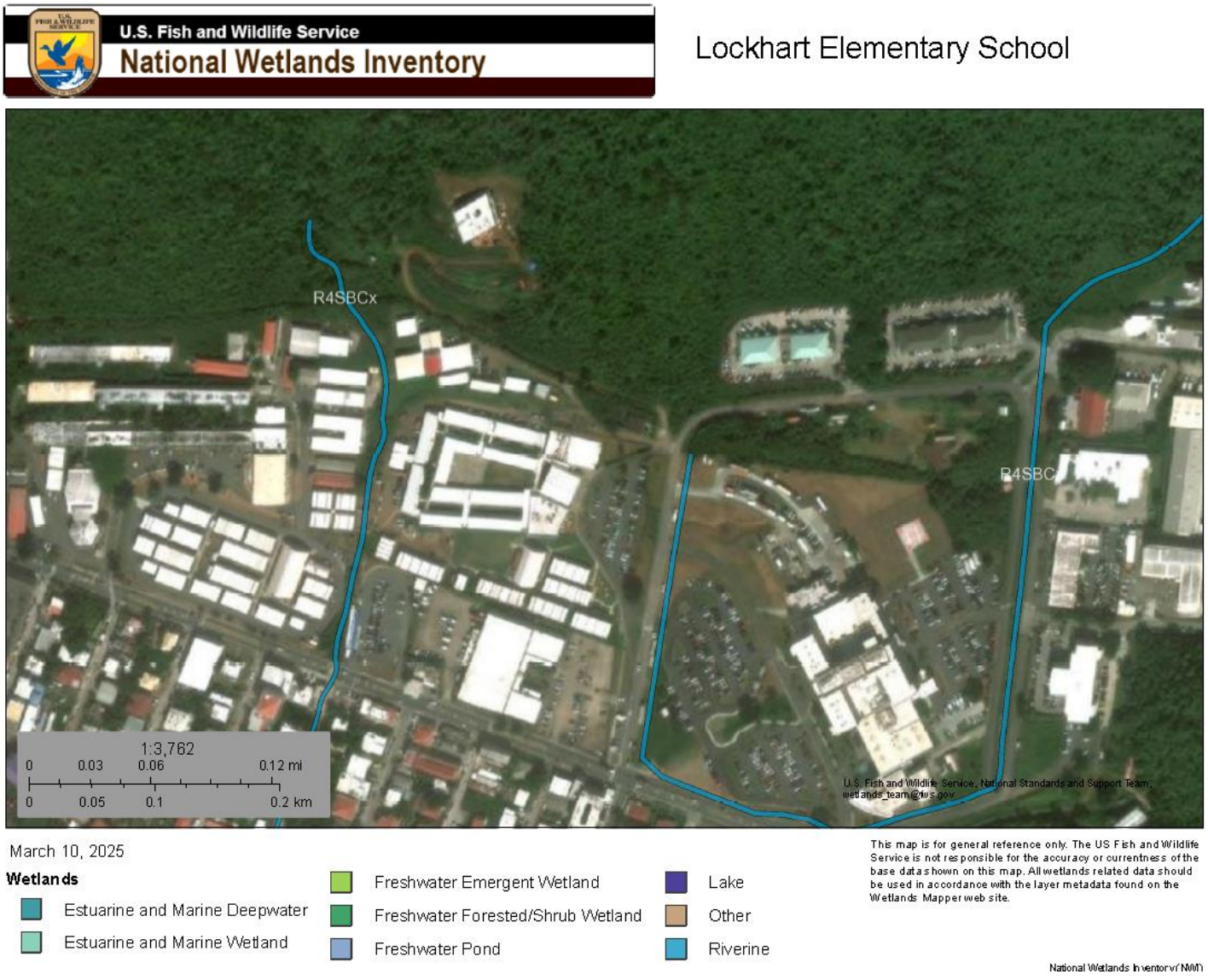


Terrestrial Resources

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 and new additional building of the existing Lockhart PreK-8th School.

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



Rare and Endangered Species

Endangered or threatened species or endangered species habitat exist within proposed project site. According to the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) project tool, endangered species, and critical habitat, are expected to be found within the proposed project site area.

Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area must be delineated. Once areas are clearly marked, and prior to any construction activity, project personnel able to correctly identify a VI Tree Boa will survey the areas to be cleared to ensure that boas are present with the work areas

Air Quality
There will be minor increases in emissions during the demolition phase of the existing buildings 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 which complies with the Coastal Land and Water Use Plan, published 2004. Impacts on the existing site: The proposed renovation/modernization of the Lockhart PreK-8th School that was destroyed by Hurricane Maria.

Visual Impacts
The proposed renovation/modernization project will thereby improve the visual appearance of the area and more. As a result, this project will have a positive impact on the existing landscape.

Historical and Archaeological Resources
The proposed renovation/modernization of the Lockhart PreK-8th School project only involves already impacted areas that have already been developed and will have no impact on any known historical or archeological resources. No undisturbed area will be affected.

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 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 **Lockhart PreK-8th School Demolition 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 will affect only previously disturbed areas. The project will not affect any natural resources and will improve the visual image of the site and enhance the overall quality of the environment in the area. This project is located outside the coastal area and is therefore consistent with this policy.

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 proposed project will have no impact on the economic development and growth in the coastal zone.

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 proposed project involves the renovation/modernization of the outside of the campus site. This project is located 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.**

Comment: The proposed project will affect only previously disturbed areas. The proposed project will have no impact on the economic development and growth in the coastal zone.

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: The proposed project will not impact trust lands or other submerged or filled lands of the U. S. Virgin Islands. The project is not located within or near trust 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 proposed project will in no way affect public access to, or use of, the shoreline. The project is located well 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.**

Comment: 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.**

Comment: - The proposed project will impact only previously disturbed areas. The project ROWSC Renovation/Modernization Project will have no impact on natural resources and will utilize best management practices (BMPs) to minimize areas of disturbance, thereby protecting adjacent habitats.

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

Comment: The proposed project will have no long-term change on sedimentation or erosion. Storm water will be directed to a gravel/ rock soak-away for percolation before any overflow into the existing drainage ways.

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

Comment: The project will have No adverse effect. Best practices and measures for erosion control will be taken in compliance with all requirements approved by DPNR. The impact on the school storm water drainage system of this project will be less than the existing conditions.

The proposed activity is consistent to the maximum extent practicable with the Virgin Islands Coastal Zone Management Program and will be conducted in a manner consistent with such program

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

FEMA Project Worksheet #: 01273

GPS Coordinates: 18.33834, -64.91375

Project Description:

Supply/Install

PC Lab

- Interactive (4) wall mount 43" and (1) wall mount 65' monitor displays. As per industry standard for education facility computer labs 5 ea.

Annex Bldg.

- Sunesta Sunstyle 4 cable retractable awning to provide shade and rain protection
- Wired Thermostat A/C controls for (4) split A/C Units
- Cyclone Fencing 6' high with galvanized pipes around condenser units at the N/E area of main bldg. 840SF
- Fire Alarm Pull Stations (2)
- Remove (2) damaged windows
- (2) Replacement Windows (36"x48")

Annex & Main Bldg.

- Exterior HVAC pipe hide including reconfiguring refrigerant copper pipes for two existing units and materials Grounds
- Miami Canopy to provide weather protection between buildings
- Construct a sidewalk for canopy and connection between buildings
- Plants and Mulch in designated areas • Repairs to existing Air Handler Unit – replace transformer
- Install new yard drain 12"x12" for condensation water, demo/dispose existing concrete pad, install inlet, install new condensation pipe to new inlet, and install 4" PVC Sch 40 pipe underground to existing inlet. Backfill/compact, new concrete pad, install (2) housekeeping for HVAC units. Support HVAC units in place with "I" beam support