

July 28, 2026

Jean-Pierre L. Oriol, Commissioner
Department of Planning and Natural Resources
4607 TuTu Park Mall
St. Thomas, VI 00802

Re: Virgin Islands Waste Management Authority Request for Coastal Consistency for their St. Croix LBJ Pump Station in Estate Richmond, St. Croix.

Dear Commissioner Oriol:

The Virgin Islands Waste Management Authority (VIWMA) respectfully request a Decision of Coastal Consistency for their proposed LBJ Pump Station in Estate Richmond, St. Croix. The Virgin Islands Waste Management Authority (VIWMA) is proposing to relocate the LBJ Pump Station and is seeking a Federal Consistency Determination from the Department of Planning and Natural Resources. The existing LBJ Pump Station will be decommissioned, and a new pump station will be constructed on a 1.67ac portion of Remainder Parcel 11, Penitentiary Land, St. Croix. This site is a previously developed site and was the location of the Ralph de Chabert housing project which has been demolished since 2013. The site is a vacant lot with scattered concrete and secondary growth.

The new pump station includes pumps with wet wells, a building with a cistern, a generator as well as three retention areas for storm water and overflow. A retaining wall will be present around the perimeter of the facility with gate access. The public water supply connection will be present on the eastern perimeter of the facility. The proposed building will have a roof water drain to facilitate rainwater collection to the on-site cistern. The new pump station design considers elevating the station controls to above flood levels and providing flood protection measures for the station.

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 are consistent with the enforceable policies of a state (territory)'s federally approved coastal management program. The Relocation of the LBJ Pump Station, 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 LBJ Pump Station relocation projects' compliance with the U.S. Virgin Islands' CZM Program.

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Attached herewith please find the Environmental Assessment for the facility showing that the LBJ Pump Station Relocation is consistent with the enforceable policies of a state (territory)'s federally approved coastal management 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 relocation of the LBJ pump station 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 relocation of the LBJ pump station project is designed to be within a currently disturbed area. The project will have a minimal impact on natural resources, archeological resources, and will improve wastewater collection for the Christiansted area.

(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 to maintain and enhance the long-term productivity of the coastal environment.

- The proposed project promotes economic development and growth in the coastal zone by providing better wastewater collection for residents and visitors and limiting future sewage bypasses.

(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 the improvement of wastewater collection service for commercial uses such as hotels and related facilities within the coastal zone.

(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 project has been designed to minimize impacts to resources. By moving the pump station out of the flood zone and further away from sensitive coastlines, it has been designed to enhance protection of critical infrastructure and, therefore, will meet and protect the economic and social needs of the St. Croix residents.

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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.

- 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.

(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 and may lead to better water quality by limiting sewage bypasses.

(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 negligible impact on natural resources and will implement 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.

- As necessary, the project will implement sedimentation and erosion control BMPs to prevent loss of sediment from the project area during construction. The new pump station will limit wastewater discharges in the future.

The proposed relocation of the LBJ pump station, as designed, will maintain coastal water quality through control of erosion, sedimentation, runoff, and siltation, protect island resources and benefit Virgin Islanders by providing more reliable wastewater collection. It is, therefore, consistent with the policy 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)].

We look forward to your earliest decision on this manner.

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Sincerely,

A handwritten signature in black ink, appearing to be 'Mike Ware', written over a circular stamp or seal.

Hannibal "Mike" Ware
Executive Director

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