



**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT/  
NOTICE OF INTENT TO REQUEST RELEASE OF FUND AND  
FINAL NOTICE AND PUBLIC EXPLANATION OF AN ACTIVITY IN A 100-YEAR  
FLOODPLAIN**

10/13/2023

Virgin Islands Housing Finance Authority  
3202 Demarara Plaza  
Suite 200  
St. Thomas, VI 00802-6447  
(340)777-4432

These notices shall satisfy three separate but related procedural requirements for activities to be undertaken by the Virgin Islands Housing Finance Authority (VIHFA).

**REQUEST FOR RELEASE OF FUNDS**

On or about October 23, 2023, the VIHFA will submit a request to the U.S. Department of Housing and Urban Development (HUD) for the release of funds under Title 1 of the Housing and Community Development Act of 1974, (PL93-383), as amended, to undertake a project known as Sister Emma Cottage for new construction. This project will replace the Sister Emma Cottage home for severely disabled children and young adults, located at Plot No. 71, Estate Concordia, St. Croix, VI. The building will be constructed on the existing Queen Louise Home for Children. The total project is expected to cost \$3,426,979.92. Community Development Block Grant-Disaster Recovery (CDBG-DR) will fund \$3,036,979.92. In addition to CDBG-DR funds, \$390,000.00 will be funded privately.

**FINDING OF NO SIGNIFICANT IMPACT**

**The VIHFA has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required.** Additional project information is contained in the Environmental Review Record (ERR). The ERR will be made available to the public for review either electronically or by U.S. mail. Please submit your request by U.S. mail to the Virgin Islands Housing Finance Authority at, Demara Plaza Suite 200 St. Thomas, VI 00802-6447, Attention Ms. Dayna Clendinen, Interim Executive Director/Chief Disaster Recovery Officer or by email to [environmental@vihfa.gov](mailto:environmental@vihfa.gov) . The ERR can be accessed online at <https://cdbgdr.vihfa.gov/> . The ERR may also be examined or copied weekdays 8A.M to 5 P.M. Person(s) interested in reviewing the ERR in-person must make an appointment prior to the interested date.

**FINAL FLOODPLAIN REVIEW**

The Sister Emma Cottage Project has been determined to be in the 100-year Floodplain according to the Advisory Base Flood Elevation (ABFE) Map. The ABFE map generated for this proposed project site is available to the public at [US Virgin Islands - Advisory Flood Hazard Resources Map \(arcgis.com\)](https://arcgis.com). The FEMA map panel numbers for the proposed project site are 7800000077G and 7800000088G. The ABFE information, storm erosion data, and related layers depicted on this web service for the USVI can serve as a guide to understanding current flood and erosion hazard conditions that communities should build to in order to reduce impacts of similar events in the future.

All elevations included on the map are referenced to the Virgin Island Vertical Datum of 2009 (VIVD 09). The VIHFA is required to perform a prescribed Eight-Step Decision-Making Process in order to determine whether there are practical alternatives to the funding of the project and identify mitigation measures to protect lives and property in the event of flooding.

The Queen Louise Home for Children is located on approximately 9.99 acres of land. Based on the 2018 Advisory Base Flood Elevation (ABFE) Maps, there is a total of 8.65 acres of the property located in the 100-Year floodplain. The total square footage of the building is approximately 9,910sqft (0.2 acres), while the construction site is estimated at 217,455 (4.99 acres) sq ft. Therefore, the proposed project is expected to have an impact on the 100-yr floodplain. The proposed building is laid out in a connected square configuration, with classrooms, bedrooms, and a multipurpose room in one wing located south. Another set of bedrooms, storage and laundry is in a separate wing located north. A cistern and Fire water tank will be located beneath the classroom wing. Administrative offices, a kitchen and laundry will be in the east wing. Therapy room, washroom, and nurses' station are in wing on the west side of the building.

Three alternatives were considered for the proposed project sites located in the 100-year floodplain, including a No Action Alternative.

- A. Relocate the proposed project to an alternative site owned by Lutheran Social Services, outside of the 100-year floodplain.

The criteria to remain within the complex cannot be met if the project was relocated outside of Plot 71 Estate Concordia. Also, the space identified for the new Sister Emma Cottage will bring the cottages on the campus closer together, which will allow for better interaction between the children and staff for campus programs.

- B. Relocate the Sister Emma Cottage site elsewhere on the project site, outside of the 100-year floodplain.

Plot no. 71 Estate Concordia comprises 9.99 acres. A total of 8.65 acres of the property is within the 100-year floodplain, while 1.35 acres is not located in the 100-year floodplain.

This amount of acreage outside of the floodplain isn't sufficient for the new cottage, parking lot and retention ponds associated with the new building.

- C. No Action Alternative

A No Action Alternative was considered and rejected as the Sister Emma Cottage was developed to assist children and young adults with severe physical and developmental disabilities. The existing cottage is their primary residence which was damaged by Hurricanes Irma and Maria. The existing cottage is in a 100-year floodplain and experienced flooding during Hurricane Irma and Maria. The new facility and proposed floodplain management measures will mitigate the current and future risks that the children and young adults face from flooding and lack of resiliency from potential hurricanes.

If no action is taken to construct safe, resilient housing, then these children and young adults will remain at risk for flooding and other hurricane damages because of their inability to evacuate during a storm event. In addition to the risk of loss of



life, medical supplies, equipment, furniture, clothing, etc. would be lost during an event.

Upon completion of the Eight-Step Decision Making Process, it has been determined that there are no practicable alternatives for the proposed construction of the Sister Emma Cottage. This is due to: (1) The project site cannot cause current residents to become displaced, (2) The project site must be within the existing Queen Louise for the Children's complex to allow for regular business operations to continue, (3) The project site must be approximately the same square footage as the current project site and contain the same number of bathrooms and bedrooms.

The Eight-Step Decision Making Process for this project has been completed and is available for public review at <https://cdbgdr.vihfa.gov/>. The Eight-Step document may also be examined or copied weekdays 8A.M to 5 P.M. Person(s) interested in reviewing the ERR in-person must make an appointment prior to the interested date.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

### **PUBLIC COMMENTS**

Any individual, group, or agency may submit written comments on the ERR to the Virgin Islands Housing Finance Authority at, 3202 Demara Plaza Suite 200 St. Thomas, VI 00802-6447, Attention Ms. Dayna Clendinen, Interim Executive Director/Chief Disaster Recovery Officer, within 15 days after the date of this publication. Comments may also be submitted via e-mail to [environmental@vihfa.gov](mailto:environmental@vihfa.gov) within 15 days after the date of this publication. All comments received by October 21, 2023 will be considered by the VIHFA prior to authorizing submission of a request for release of funds. Comments should specify which notice is being addressed.

### **ENVIRONMENTAL CERTIFICATION**

The VIHFA certifies to U.S. Department of Housing and Urban Development (HUD) that Ms. Dayna Clendinen in her capacity as VIHFA Interim Executive Director consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the VIHFA to use CDBG-DR funds.

### **OBJECTIONS TO RELEASE OF FUNDS**

HUD will accept objections to its release of funds and the VIHFA's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the VIHFA; (b) the VIHFA has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs



or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to U.S. Department of Housing and Urban Development, Caribbean Area Office, Region VI, 235 Federico Costa Street, Suite 200, Parque Las Américas I Building, San Juan, Puerto Rico, 00918. Due to the ongoing pandemic, comments and objections to the FONSI may also be submitted via e-mail to [CPD\\_COVID-19OEE-SJU@hud.gov](mailto:CPD_COVID-19OEE-SJU@hud.gov). Potential objectors should contact HUD to verify the actual last day of the objection period.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dayna Clendinen", is written over the word "Sincerely,".

Dayna Clendinen

Interim Executive Director/Chief Disaster Recovery Officer