

July 14, 2026



Honorable Governor Bryan, Members of the Senate, DPP Commissioner Alejandro:

Enclosed is a comprehensive package of lease amendments that WICA respectfully submits for discussion. These proposed amendments address six (6) fundamental legal and policy issues that must be resolved before any lease should move forward. Among other things, they preserve the Legislature's statutory authority over future lease amendments and land sales, protect property previously dedicated by law to the Virgin Islands Housing Finance Authority under Act No. 6752 and to the Veterans Land Program under Act No. 7321, preserve lands designated for transfer to the Virgin Islands Territorial Park System and the Department of Planning and Natural Resources' Historic Preservation Office, and correct acknowledged errors contained in the proposed lease.

We read with interest Lieutenant Governor Roach's comments reported by the *St. Thomas Source* on July 12, 2026, in which he stated that "it was up to the Legislature to conduct their due diligence on the project" and that he was unaware of any required timeframe. While WICA disagrees with the Lieutenant Governor regarding the appropriate scale of development for Water Island, we fully agree with his central point: meaningful legislative due diligence is essential and should never be constrained by an artificial deadline.

The people of Water Island have had fewer than six weeks to evaluate one of the largest and most consequential development proposals in the island's history. During that time, the community has still not received the public town hall meeting repeatedly promised by the Department of Property and Procurement. There has been no public input on the newest lease just filed with the Legislature, which was apparently signed while the last telephone hearing was taking place.

We have sought information in good faith by submitting detailed questions to WIDC in an effort to understand the proposal. Unfortunately, meaningful answers have been the exception rather than the rule. Of our 43 follow-up questions, only nine received substantive responses. Twenty-two were not answered at all, and four received responses that did not address the questions asked. Those follow-up questions were necessary because the original responses were similarly inadequate and unresponsive, and many of the few actual answers were framed only as the developer's "goal" or "aspiration," rather than a reliable committed response. The most common response was simply that "the final plans have not been drafted, so it is not possible to accurately respond." That explanation misses the point entirely. We were not asking for architectural details or final engineering drawings, rather common-sense questions that every community has the right to know before public land is committed for ninety-nine years. One example of a typical Q&A is quite instructive. Where will the wastewater treatment plant and the desalination plant be located? Where will electrical generation occur? Where will the solid waste processing and garbage incineration complex be located? When faced with a proposal to develop nearly every available acre on this tiny island for housing, there is no apparent non-residential area left for an industrial complex, let alone four of them. These are not trivial questions—they directly affect every resident's health, property, quality of life, and environment. A development appropriately scaled to Water Island may not require such large-scale industrial complexes in the first place. Due diligence requires information. It cannot be performed when critical questions go unanswered.

This proposal attempts to place far more development on Water Island than the island can reasonably support. Continuing down the current path is likely to result in years of litigation, regulatory challenges, public opposition, and uncertainty for both the Government and the developer. No one benefits from that outcome. There is a better path. Rather than spending another decade defending a proposal that divides the community, raises significant legal questions, and yields nothing, we urge the Government to solicit proposals for a hotel/marina development that respects the island's physical limitations, complies with existing law, and earns broad public support. There are qualified developers capable of delivering a first-class resort and marina that fits Water Island rather than overwhelms it. WIDC may well be one of them.

This is an opportunity to move beyond conflict. By working together to develop a project that is legally sound, environmentally responsible, and appropriately scaled, the developer can begin construction sooner, avoid years of costly litigation, and deliver a project that the people of Water Island can proudly support. That is the outcome everyone should be striving to achieve.

Chuck Nestrud, President
Water Island Civic Association

