## [EXTERNAL MAIL] Application ZAC-22-14

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To: Leia LaPlace <leia.laplace@dpnr.vi.gov>

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Dear Ms, LaPlace and other members of DPNR, Division of Comprehensive and Coastal Zone Planning,

I am writing to you with my reasons for asking you not to grant a zoning variance from B2 to Commercial and recommending same to the VI Legislature for plots 50-01 and 50-04 Estate Orange Grove Company Quarter St Croix. Innovative Asset Group, Inc.applicant.

This is an area that I traverse regularly and know well.

The manufacturing of cement, (concrete) blocks involves a mixture of powdered portland cement, water, sand, and gravel. These materials will need to be delivered to the plant site several times a day, a week, or a month, utilizing the only access which is a 2-lane hillside road. Just Right Trucking, (Plot 50-1 and 50-4) is on the curve of that road. Please see photos attached.

It is a dangerous location for heavy truck traffic, entering and exiting on a downhill curve hauling cement, water, sand, and gravel and leaving with trucks ladened with concrete blocks. This would be a recipe for disaster.

While the applicants have said that the manufacturing of the blocks will be inside a building, the storage of the materials will have to be outside, with the chance of the finer materials blowing east to west into the Golden Rock Shopping center and the JFK housing community. As it is now, the site, which was a fully forested hill, has been severely scared, and excavated significantly with erosion a problem and not in keeping with keeping with B2 zoning.

In reviewing the Zoning guidelines on the DPNR website, Commercial zoning does not permit the manufacturing of concrete products or a ready-mix plant. The manufacturing of concrete blocks sounds like the "manufacturing of concrete products." It also calls for only 50% of the land be in use; this puts this manufacturing plant on less than one acre. I can only suppose that they plan to take down more of the hill.

Lastly, granting this variance would be an example of spot zoning, which we believe is against what our community and DPNR has been working against. Instead, we thought we were working towards a comprehensive land use plan that will place all heavy manufacturing in one general location on the island. DPNR's mission statement as guoted from the website is" to protect, maintain and manage the natural and cultural resources of the Virgin Islands, through the coordination of economic development, in collaboration with local, federal, and non-government organizations, enabling present and future Virgin Island generations to live safer, fuller lives in harmony with their environment and cultural heritage." Allowing this zoning variance in an area that is used by the community for shopping and living does not go along with the mission statement.

I firmly believe that this application should be denied, for the variety of reasons I have outlined.

Thank you for your time and attention to my concerns which I am sure are shared by many of the citizens of this beautiful island.

Isabel Brady

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